

# **Exhibit B**

CONDENSED

----- x  
In the Matter of the Claim of

Ray Santana,

Claimant,

- against -

Mount Vernon City School District / Board of  
Education, Kenneth Hamilton Superintendant,

Respondents.  
----- x

June 19, 2019  
10:05 a.m.

50-h Examination of Claimant,  
RAY ANTHONY SANTANA, shown in caption as RAY  
SANTANA, pursuant to NYS Education Law Section  
3813, held at the Offices of the Mount Vernon  
City School District, 165 North Columbus  
Avenue, Mount Vernon, New York 10553 before a  
Notary Public of the State of New York.

\* \* \*

SANDY SAUNDERS REPORTING  
254 South Main Street  
Second Floor  
New City, New York 10956  
(845) 634-7561

<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 A P P E A R A N C E S:</p> <p>3</p> <p>4 GLASS &amp; HOGROGIAN, LLP</p> <p>5 Attorneys for Claimant</p> <p>6 85 Broad Street, 18th Floor</p> <p>7 New York, New York 10004</p> <p>8 BY: BRYAN GLASS, ESQ.</p> <p>9</p> <p>10 SILVERMAN &amp; ASSOCIATES</p> <p>11 Attorneys for Respondent</p> <p>12 445 Hamilton Avenue</p> <p>13 Suite 1102</p> <p>14 White Plains, New York 10601</p> <p>15 BY: JOSHUA M. GOLDSTEIN, ESQ.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 S T I P U L A T I O N S:</p> <p>3</p> <p>4 IT IS HEREBY STIPULATED AND AGREED</p> <p>5 by and between the attorneys for the</p> <p>6 respective parties hereto, that this</p> <p>7 examination may be sworn to before any</p> <p>8 Notary Public.</p> <p>9</p> <p>10 IT IS FURTHER STIPULATED AND</p> <p>11 AGREED that the filing and certification</p> <p>12 of the said examination shall be waived.</p> <p>13</p> <p>14 IT IS FURTHER STIPULATED AND</p> <p>15 AGREED that all objections to questions,</p> <p>16 except as to the form of the question,</p> <p>17 shall be reserved for the time of trial.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 4</p> <p>1 - Ray Santana -</p> <p>2 R A Y S A N T A N A ,</p> <p>3 Claimant herein, having been first duly</p> <p>4 sworn/affirmed by John M. Boland, a Notary</p> <p>5 Public of the State of New York, was examined</p> <p>6 and testified as follows:</p> <p>7 THE REPORTER: Please state</p> <p>8 your name for the record.</p> <p>9 THE WITNESS: Ray Santana.</p> <p>10 THE REPORTER: Please state</p> <p>11 your address for the record.</p> <p>12 THE WITNESS: 2 Hilltop Manor;</p> <p>13 Danbury, Connecticut 06811.</p> <p>14</p> <p>15 EXAMINATION BY</p> <p>16 MR. GOLDSTEIN:</p> <p>17 Q. Good morning.</p> <p>18 This is the 50-h examination of</p> <p>19 Ray Santana.</p> <p>20 My name is Joshua Goldstein. I'm</p> <p>21 an attorney with Silverman &amp; Associates. We</p> <p>22 represent the Respondents, the Mount Vernon</p> <p>23 City School District and Dr. Kenneth Hamilton</p> <p>24 regarding the Notice of Claim that you've</p> <p>25 filed.</p>	<p style="text-align: right;">Page 5</p> <p>1 - Ray Santana -</p> <p>2 I'd like to ask you some questions</p> <p>3 about the Notice of Claim and some of the facts</p> <p>4 underlying your Notice of Claim, but I'd like</p> <p>5 to go over some ground rules before we get</p> <p>6 started.</p> <p>7 If you don't understand a question</p> <p>8 I've asked please let me know and I'll do my</p> <p>9 best to rephrase it; however, if you do not ask</p> <p>10 for clarification I'm going to assume that you</p> <p>11 understood my question as I asked it. Okay?</p> <p>12 A. (Indicating.)</p> <p>13 Q. Also, as you can see, there is a</p> <p>14 Court Reporter here so you have to use verbal</p> <p>15 answers and no uh-huhs, un-unhs, or shaking of</p> <p>16 the head. I will do my best to remind you if</p> <p>17 you do; but, as you can see, we're making a</p> <p>18 record here and your use of verbal answers will</p> <p>19 be greatly appreciated.</p> <p>20 Now sometimes I'll be asking you a</p> <p>21 question and you might anticipate what I'm</p> <p>22 asking and may want to jump in and come in with</p> <p>23 an answer, but sometimes my question may not be</p> <p>24 what you're thinking.</p> <p>25 Also, with a Court Reporter, that</p>

<p style="text-align: right;">Page 6</p> <p>1 - Ray Santana -</p> <p>2 can sometimes lead to crosstalk with two people</p> <p>3 talking at the same time and it will be</p> <p>4 difficult for him to accurately get all the</p> <p>5 crosstalk on the record. For that reason we</p> <p>6 should try to speak one at a time. Please</p> <p>7 allow me to finish my question and I will do my</p> <p>8 best to allow you to finish your answer. If</p> <p>9 you need to continue with your answer please</p> <p>10 let me know and I will let you finish your</p> <p>11 answer. Okay?</p> <p>12 A. Yes, sir.</p> <p>13 Q. If you need a break you can take a</p> <p>14 break whenever you'd like. The only exception</p> <p>15 is if there's a pending question. So if I've</p> <p>16 asked you question if you could finish</p> <p>17 answering that question before you take a break</p> <p>18 that would be greatly appreciated. Okay?</p> <p>19 A. Yes.</p> <p>20 Q. Now sometimes I might use the term</p> <p>21 "the District." For the record, that will be</p> <p>22 referring to the Mount Vernon City School</p> <p>23 District. Okay?</p> <p>24 A. Yes, sir.</p> <p>25 Q. So I realized you gave it, but</p>	<p style="text-align: right;">Page 7</p> <p>1 - Ray Santana -</p> <p>2 could you repeat your full name?</p> <p>3 A. Ray Anthony Santana.</p> <p>4 Q. And what is your address?</p> <p>5 A. 2 Hilltop Manor, Number 2;</p> <p>6 Danbury, Connecticut 06811.</p> <p>7 Q. How long have you lived at that</p> <p>8 address?</p> <p>9 A. Fourteen-and-a-half years.</p> <p>10 Q. Do you live with anyone at that</p> <p>11 address?</p> <p>12 A. Yes; my wife.</p> <p>13 Q. What's your wife's name?</p> <p>14 A. Ava Maria.</p> <p>15 Q. And do you have any children?</p> <p>16 A. Not with this wife; no, sir.</p> <p>17 Q. What is your date of birth?</p> <p>18 A. XX/XX/56.</p> <p>19 Q. How old are you?</p> <p>20 A. 63-years-old, sir.</p> <p>21 Q. Just for the record, only the year</p> <p>22 of your birth will show in the transcript, not</p> <p>23 the full date.</p> <p>24 A. Thank you.</p> <p>25 Q. I'll ask for your Social Security</p>
<p style="text-align: right;">Page 8</p> <p>1 - Ray Santana -</p> <p>2 Number; but, once again, we will only show the</p> <p>3 last four digits in the transcript. I need</p> <p>4 that for insurance purposes.</p> <p>5 A. XXX-XX-6101.</p> <p>6 Q. Are you represented by legal</p> <p>7 Counsel today?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Who is your legal Counsel?</p> <p>10 A. Mr. Bryan Glass, Esquire.</p> <p>11 Q. When did you retain his services?</p> <p>12 A. Approximately a month-and-a-half</p> <p>13 ago.</p> <p>14 Q. You understand that you have the</p> <p>15 obligation to tell the truth today?</p> <p>16 A. Yes.</p> <p>17 Q. Are there any conditions which</p> <p>18 would impact or prevent you from recalling</p> <p>19 facts and giving accurate and truthful</p> <p>20 testimony today?</p> <p>21 A. No.</p> <p>22 Q. Are you aware of any medication</p> <p>23 that you generally take or you were supposed to</p> <p>24 take that you have not taken today?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 9</p> <p>1 - Ray Santana -</p> <p>2 Q. Is there any reason you would be</p> <p>3 unable to understand my questions?</p> <p>4 A. No, sir.</p> <p>5 Q. Is there any reason you would be</p> <p>6 unable to answer my questions truthfully and</p> <p>7 accurately?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you have a high school diploma?</p> <p>10 A. Yes.</p> <p>11 Q. From what institution?</p> <p>12 A. Columbus High School, 1974.</p> <p>13 Q. And --</p> <p>14 A. That's in the Bronx, New York.</p> <p>15 Q. Do you have an undergraduate</p> <p>16 degree?</p> <p>17 A. Yes, sir.</p> <p>18 Q. From what institution?</p> <p>19 A. Mercy College; Dobbs Ferry, New</p> <p>20 York.</p> <p>21 Q. What year did you receive that?</p> <p>22 A. Now you're pushing it; I don't</p> <p>23 remember.</p> <p>24 Q. Okay.</p> <p>25 Do you remember your major?</p>

<p style="text-align: right;">Page 10</p> <p>1 - Ray Santana -</p> <p>2 A. Behavioral Science.</p> <p>3 Q. Do you have any post-college</p> <p>4 degrees?</p> <p>5 A. I have three Masters Degrees, sir.</p> <p>6 Q. What are your Masters in?</p> <p>7 A. My first Masters Degree is in</p> <p>8 Elementary Education from the University of</p> <p>9 Bridgeport in Bridgeport, Connecticut.</p> <p>10 My second Masters Degree is in</p> <p>11 Special Education from Mercy College in Dobbs</p> <p>12 Ferry, New York.</p> <p>13 And my last Masters Degree is as a</p> <p>14 School Media Specialist from Iona College in</p> <p>15 New Rochelle, New York.</p> <p>16 Q. When did you obtain your Masters</p> <p>17 in Elementary Education?</p> <p>18 A. I would have to say by December</p> <p>19 1998.</p> <p>20 Q. When did you obtain your Masters</p> <p>21 in Special Education?</p> <p>22 A. I can't remember.</p> <p>23 This was all done within a span of</p> <p>24 about four-and-a-half years, five years; so</p> <p>25 somewhere before 2003.</p>	<p style="text-align: right;">Page 11</p> <p>1 - Ray Santana -</p> <p>2 Q. You're saying you attained your</p> <p>3 degrees between 1998 and 2003?</p> <p>4 A. Correct.</p> <p>5 Also, when I attained my Masters</p> <p>6 in School Media Specialist I did one degree</p> <p>7 after another. They're full degrees; I went to</p> <p>8 full degree programs.</p> <p>9 Q. How long was each degree program?</p> <p>10 A. A year-and-a-half of intense,</p> <p>11 intense studies.</p> <p>12 Q. Is it fair to say that your</p> <p>13 Masters Degree as a School Media Specialist is</p> <p>14 the title of the degree?</p> <p>15 A. I do not recall; I would have to</p> <p>16 refer to my resume. I'm referring to that</p> <p>17 because that is the title that was given when</p> <p>18 the State issued my license.</p> <p>19 Q. I was referring to the degree, but</p> <p>20 that was the license you were conferred by the</p> <p>21 State?</p> <p>22 A. Correct.</p> <p>23 Q. Well, let me ask you this.</p> <p>24 Do you have any educational</p> <p>25 certifications or licenses?</p>
<p style="text-align: right;">Page 12</p> <p>1 - Ray Santana -</p> <p>2 A. I have three permanent</p> <p>3 certifications through the State of New York in</p> <p>4 Teaching.</p> <p>5 Q. Tell me what those are.</p> <p>6 A. The first one would be Pre-K</p> <p>7 through Sixth, Elementary Education; the second</p> <p>8 would read Special Education; and the last one</p> <p>9 would read School Media Specialist.</p> <p>10 Q. Do you remember when you attained</p> <p>11 those certifications? Did you attain those</p> <p>12 certifications around the time you attained</p> <p>13 your various Masters Degrees?</p> <p>14 A. Oh, yes; I would do one right</p> <p>15 after the other.</p> <p>16 I know that the last one was</p> <p>17 conferred by the State of New York on February</p> <p>18 1, 2004.</p> <p>19 Q. When you refer to "the last one"</p> <p>20 are you referring to the certification as a</p> <p>21 School Media Specialist?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Besides those three certifications</p> <p>24 do you have any other Education certifications</p> <p>25 or licenses?</p>	<p style="text-align: right;">Page 13</p> <p>1 - Ray Santana -</p> <p>2 A. Not currently, sir.</p> <p>3 Q. Are you currently employed?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Where are you employed?</p> <p>6 A. The Mount Vernon City School</p> <p>7 District in Mount Vernon, New York.</p> <p>8 Q. How long have you been employed by</p> <p>9 the Mount Vernon City School District?</p> <p>10 A. Nineteen years, sir.</p> <p>11 Q. Nineteen years?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And what is your current role here</p> <p>14 at the Mount Vernon City School District?</p> <p>15 A. My current role is I'm a Special</p> <p>16 Needs Teacher, comma, Special Education; the</p> <p>17 reference is interchangeable nowadays.</p> <p>18 Q. Do you serve at a particular</p> <p>19 school or multiple schools?</p> <p>20 A. I've been serving at Mount Vernon</p> <p>21 High School.</p> <p>22 Q. How long have you been at Mount</p> <p>23 Vernon High School?</p> <p>24 A. Except for one year I've been</p> <p>25 there my entire career in the District.</p>

<p style="text-align: right;">Page 14</p> <p>1 - Ray Santana -</p> <p>2 Q. Have you ever sued someone before?</p> <p>3 A. No, sir.</p> <p>4 Q. Have you ever been sued?</p> <p>5 A. No, sir.</p> <p>6 Q. Have you ever been convicted of a</p> <p>7 crime?</p> <p>8 A. No, sir.</p> <p>9 Q. Have you ever filed a Notice of</p> <p>10 Claim before, other than the current claim?</p> <p>11 A. No, sir.</p> <p>12 Q. Have you ever filed a grievance?</p> <p>13 A. Yes.</p> <p>14 Q. Do you remember when you filed a</p> <p>15 grievance?</p> <p>16 A. I filed grievances each year since</p> <p>17 they initiated the APPR Annual Review.</p> <p>18 Q. When did they implement the APPR?</p> <p>19 A. It's been about four years now.</p> <p>20 Q. Why did you file the grievances</p> <p>21 since the APPR?</p> <p>22 A. Because the evaluation process</p> <p>23 kept assessing me in manners that I couldn't</p> <p>24 agree to.</p> <p>25 Q. Let's stipulate for the record</p>	<p style="text-align: right;">Page 15</p> <p>1 - Ray Santana -</p> <p>2 that "APPR" --</p> <p>3 A. It means Annual Peer Performance</p> <p>4 Review.</p> <p>5 Q. When you testified a moment ago</p> <p>6 about matters you couldn't agree with -- Am I</p> <p>7 quoting you correctly?</p> <p>8 A. One in particular --</p> <p>9 Q. Let me finish the question.</p> <p>10 A. I'm sorry, sir.</p> <p>11 Q. That's okay.</p> <p>12 -- what were the matters you</p> <p>13 couldn't agree with; what specifically are you</p> <p>14 referring to?</p> <p>15 A. Such as when the students weren't</p> <p>16 able to become proficient in a particular</p> <p>17 subject area.</p> <p>18 Q. How does that relate, though, to</p> <p>19 your evaluation; what's the connection there?</p> <p>20 A. They have to take into account</p> <p>21 that I deal with mostly Special Needs children.</p> <p>22 With the APPR it's not always easy to go by</p> <p>23 their standard; I have to go by what you call</p> <p>24 an Individual Education Plan.</p> <p>25 Q. Did you feel that it was unfair,</p>
<p style="text-align: right;">Page 16</p> <p>1 - Ray Santana -</p> <p>2 that your performance was essentially linked</p> <p>3 to the performance of your students?</p> <p>4 A. Correct.</p> <p>5 Q. Why is that?</p> <p>6 A. Well, because the students that I</p> <p>7 deal with, generally speaking, may be low</p> <p>8 performing in a subject area and/or have other</p> <p>9 mitigating factors that affect the traditional</p> <p>10 classroom.</p> <p>11 Q. Do you believe that those special</p> <p>12 circumstances are not taken into account in</p> <p>13 your evaluation?</p> <p>14 A. No, sir.</p> <p>15 Q. Have you had a discussion with</p> <p>16 anyone about this?</p> <p>17 A. We have; and I've filed my</p> <p>18 grievances; and they come back pretty much</p> <p>19 perfunctory, even when I told them that they</p> <p>20 haven't evaluated me in the proper sense.</p> <p>21 Q. When you say "them" are you</p> <p>22 referring to anyone specifically at the</p> <p>23 District?</p> <p>24 A. The Peer Review is -- I'm not</p> <p>25 quite sure what it's called -- is a council</p>	<p style="text-align: right;">Page 17</p> <p>1 - Ray Santana -</p> <p>2 that supposedly reviews all these APPRs that</p> <p>3 are in dispute.</p> <p>4 Q. Do you remember having a</p> <p>5 conversation with any specific people about</p> <p>6 this issue?</p> <p>7 A. I've discussed it with the union</p> <p>8 more than once; they're aware of it. I was one</p> <p>9 of many teachers who had the same discussions</p> <p>10 with them.</p> <p>11 Q. But let me ask you this question.</p> <p>12 When I was asking Did you talk to</p> <p>13 anyone about this issue, let me specify. Did</p> <p>14 you speak to any sort of District</p> <p>15 Administrators about this issue or did you only</p> <p>16 speak to the union?</p> <p>17 A. I only spoke to the union.</p> <p>18 Q. I think we touched on this</p> <p>19 briefly, let me just finish it out.</p> <p>20 What were the results of those</p> <p>21 grievances?</p> <p>22 A. If I recall correctly two of them</p> <p>23 were in my favor and the rest were not.</p> <p>24 Q. "The rest" being another two?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 18</p> <p>1 - Ray Santana -</p> <p>2 Q. Do you remember when the ones that</p> <p>3 were in your favor were, what years?</p> <p>4 A. No, sir.</p> <p>5 Q. Besides those four grievances</p> <p>6 we've talked about are there any other times</p> <p>7 you have filed a grievance?</p> <p>8 A. Not that I can recall.</p> <p>9 Q. Just to confirm.</p> <p>10 Those four grievances happened</p> <p>11 within the last four to five years?</p> <p>12 A. Correct.</p> <p>13 Q. Have you ever filed an</p> <p>14 administrative appeal or an appeal before an</p> <p>15 administrative agency before?</p> <p>16 A. No, sir.</p> <p>17 Q. Have you ever filed a complaint</p> <p>18 before the New York State Division of Human</p> <p>19 Rights?</p> <p>20 A. Yes, sir.</p> <p>21 Q. When did you file that complaint?</p> <p>22 A. That would have been recent; I</p> <p>23 believe May of 2019.</p> <p>24 Q. Have you filed a complaint with</p> <p>25 the United States Equal Employment Opportunity</p>	<p style="text-align: right;">Page 19</p> <p>1 - Ray Santana -</p> <p>2 Commission?</p> <p>3 A. No, sir.</p> <p>4 Q. Have you filed a complaint before</p> <p>5 any other New York State agency?</p> <p>6 A. No, sir.</p> <p>7 MR. GLASS: I will note that the</p> <p>8 complaint filed with the New York State</p> <p>9 Division of Human Rights was cross-filed with</p> <p>10 the US EEOC.</p> <p>11 Q. Let me ask you this way.</p> <p>12 Besides the complaint you</p> <p>13 cross-filed with New York State and the US EEOC</p> <p>14 have you filed any other complaints before the</p> <p>15 US Equal Employment Opportunity Commission?</p> <p>16 A. No.</p> <p>17 MR. GOLDSTEIN: Let's mark this</p> <p>18 document as Respondent's A.</p> <p>19 (Document, Written Verified Notice</p> <p>20 of Claim, marked for identification as</p> <p>21 Respondent's Exhibit A.)</p> <p>22 Q. I'm showing you a document marked</p> <p>23 as Respondent's A. Take a look through that.</p> <p>24 Take your time, then let me know when you're</p> <p>25 finished reviewing it.</p>
<p style="text-align: right;">Page 20</p> <p>1 - Ray Santana -</p> <p>2 (Witness examines document.)</p> <p>3 A. I assume that Section 3 is</p> <p>4 referring to the certification branches as</p> <p>5 Elementary --</p> <p>6 Q. For now just let me know when</p> <p>7 you're done reviewing the document.</p> <p>8 (Witness examines document.)</p> <p>9 A. Thank you.</p> <p>10 Q. Are you finished reviewing the</p> <p>11 document?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Have you looked through all of</p> <p>14 Respondent's Exhibit A?</p> <p>15 A. Yes.</p> <p>16 Q. Do you recognize this document?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Is this document the Notice of</p> <p>19 Claim you filed against the Respondents?</p> <p>20 A. Yes, sir.</p> <p>21 Q. If you would, go to the fourth</p> <p>22 page of the document.</p> <p>23 A. (Witness complies.)</p> <p>24 Q. Is that your signature on the</p> <p>25 fourth page of that document?</p>	<p style="text-align: right;">Page 21</p> <p>1 - Ray Santana -</p> <p>2 A. Yes, sir.</p> <p>3 Q. Other than your attorney did you</p> <p>4 talk to anyone about your Notice of Claim?</p> <p>5 A. No, sir.</p> <p>6 Q. Before today's 50-h examination</p> <p>7 did you review any documents?</p> <p>8 A. I'm not sure what you're asking.</p> <p>9 Q. Before today's examination, so</p> <p>10 before right now, did you review any documents</p> <p>11 or correspondence in preparation?</p> <p>12 A. Other than the documents that I</p> <p>13 have; that's about all.</p> <p>14 Q. What documents do you have?</p> <p>15 A. Documents as far as the</p> <p>16 allegations that I've made. I reviewed my</p> <p>17 certifications. I also reviewed instances</p> <p>18 where I felt that I was treated inequitably.</p> <p>19 And that's about it.</p> <p>20 Q. In what sense were you treated</p> <p>21 inequitably?</p> <p>22 A. I'm referring to my communications</p> <p>23 with the HR Department, with my Superintendent,</p> <p>24 also with the Principal of Mount Vernon High</p> <p>25 School, Mr. Gonzalez. That's it; that I can</p>



<p style="text-align: right;">Page 22</p> <p>1 - Ray Santana -</p> <p>2 recall.</p> <p>3 Q. Did anyone besides your attorney</p> <p>4 help you draft this Notice of Claim?</p> <p>5 A. No, sir.</p> <p>6 Q. Is everything in this Notice of</p> <p>7 Claim true and accurate to your knowledge?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Besides reviewing the</p> <p>10 correspondence and the documents you talked</p> <p>11 about did you do anything else to prepare to</p> <p>12 testify today?</p> <p>13 A. Not in particular.</p> <p>14 Q. Other than Counsel did anyone tell</p> <p>15 you what to say at this 50-h examination?</p> <p>16 A. No, sir.</p> <p>17 Q. So I know we talked about it a</p> <p>18 moment ago, but refresh my memory. What</p> <p>19 certifications do you currently possess?</p> <p>20 A. My certifications for New York</p> <p>21 State are for Pre-K to Sixth Elementary,</p> <p>22 permanent; Special Education, permanent; also</p> <p>23 School Media Specialist, permanent. All of</p> <p>24 them are with the State of New York Education</p> <p>25 Department.</p>	<p style="text-align: right;">Page 23</p> <p>1 - Ray Santana -</p> <p>2 Q. So what did you have to do to</p> <p>3 obtain your certification as a School Media</p> <p>4 Specialist?</p> <p>5 A. I attended a degree program with</p> <p>6 Iona College in New Rochelle and successfully</p> <p>7 graduated the degree program, which was a</p> <p>8 Masters program.</p> <p>9 Q. What did you have to do to attain</p> <p>10 that degree?</p> <p>11 A. Following the course of study that</p> <p>12 was necessary. It was dealing with educational</p> <p>13 issues using technology and the integration of</p> <p>14 that technology in the classroom.</p> <p>15 Also how to access using</p> <p>16 technology tools as well as the use of</p> <p>17 resources, some in the traditional library way</p> <p>18 and some of the newer type of electronic</p> <p>19 formats that are coming into being. Also how</p> <p>20 to discuss ethical issues and various usage.</p> <p>21 It was a very comprehensive</p> <p>22 program.</p> <p>23 And basic coding. And</p> <p>24 understanding the integration of all of these</p> <p>25 in a manner that can be used across the board</p>
<p style="text-align: right;">Page 24</p> <p>1 - Ray Santana -</p> <p>2 as far as ability education-wise and age</p> <p>3 groups.</p> <p>4 Q. Did you have to do any like</p> <p>5 student teaching before attaining that degree</p> <p>6 or certification?</p> <p>7 A. No, because I was already</p> <p>8 certified as a teacher.</p> <p>9 Q. Was there any sort of student</p> <p>10 teaching or student regimen requirement in</p> <p>11 order to attain your certification as a School</p> <p>12 Media Specialist?</p> <p>13 A. Since I was doing that at the same</p> <p>14 time that was taken in lieu of that. If</p> <p>15 someone coming from the outside didn't have a</p> <p>16 teaching certification then they would have to</p> <p>17 go through the formal process as a student</p> <p>18 teacher that generally lasts three to six</p> <p>19 months. In my case, because I had already been</p> <p>20 doing it in the classroom I was not held to</p> <p>21 that standard.</p> <p>22 Q. What do you mean by "already doing</p> <p>23 it"?</p> <p>24 A. I was in the classroom at the time</p> <p>25 that I received this degree. I was already</p>	<p style="text-align: right;">Page 25</p> <p>1 - Ray Santana -</p> <p>2 engaged, and I want to say that I might have</p> <p>3 had tenure already as a tech -- teaching</p> <p>4 Technology at Mount Vernon High School.</p> <p>5 Q. When you referred a moment ago to</p> <p>6 the course work you had to do to attain your</p> <p>7 degree to get your certification you mentioned</p> <p>8 "the traditional library way"; what do you mean</p> <p>9 by that?</p> <p>10 A. I would say since the late 1990s</p> <p>11 there's been a tremendous change as far as</p> <p>12 research and being able to obtain information;</p> <p>13 whereas in my date you went down to the local</p> <p>14 library, if you were fortunate enough, and</p> <p>15 literally went through the encyclopedias and</p> <p>16 periodicals available.</p> <p>17 It's been a radical 20, 25 years</p> <p>18 where most publications have been posted</p> <p>19 on-line. Of course there has always been the</p> <p>20 availability of seeing publications that may</p> <p>21 counter that research throughout the process,</p> <p>22 so there's a lot of on-line discernibility that</p> <p>23 you have to take. That's the reason why Ethics</p> <p>24 was being taught.</p> <p>25 Also what would be considered</p>



<p style="text-align: right;">Page 26</p> <p>1 - Ray Santana -</p> <p>2 proper techniques for research. I would say up</p> <p>3 through about the 19 -- until 2006 it was very</p> <p>4 prevalent at that time that you can actually go</p> <p>5 into groups where you would discuss and target</p> <p>6 maybe one subject area; let's say the use of</p> <p>7 solar power in a particular situation. Now</p> <p>8 it's quite possible for you to be involved in</p> <p>9 multiple groups with multiple interests; it</p> <p>10 would not be as targeted as they were in the</p> <p>11 past.</p> <p>12 Also what seems to be popular</p> <p>13 today is social media, which has taken off</p> <p>14 dramatically. Some people have used that to</p> <p>15 espouse certain ideas and thought processes and</p> <p>16 other people have taken them as authentic or</p> <p>17 have sought to legitimize them.</p> <p>18 Q. I want to circle back a little</p> <p>19 bit.</p> <p>20 The extent to which you were</p> <p>21 referring to the course work in attaining your</p> <p>22 degree and then subsequent certification as a</p> <p>23 School Media Specialist, you said that had to</p> <p>24 do with the library. Were you referring to the</p> <p>25 use of technology in a school library?</p>	<p style="text-align: right;">Page 27</p> <p>1 - Ray Santana -</p> <p>2 A. The use of technology across the</p> <p>3 board through the platform of the school</p> <p>4 library in most instances. Because the primary</p> <p>5 function was also to be able to provide the</p> <p>6 information but use what I accept as a library</p> <p>7 as a portal because there are certain</p> <p>8 safeguards integrated into it.</p> <p>9 Q. But you wouldn't describe that as</p> <p>10 Library Science course work, would you?</p> <p>11 A. It's the same; because what you're</p> <p>12 doing is retrieving information, just with the</p> <p>13 traditional source where you would have the</p> <p>14 Dewey Decimal System and the actual physicality</p> <p>15 of books, encyclopedias, and physical</p> <p>16 periodicals, and stuff. Now it would be we're</p> <p>17 studying that as well as a heavy emphasis on</p> <p>18 electronic retrieval in the presentation of</p> <p>19 information.</p> <p>20 Q. So the course work about the</p> <p>21 retrieval of the information and the use of</p> <p>22 technology, was that a brief summation of the</p> <p>23 kind of course work you were describing a</p> <p>24 little while ago?</p> <p>25 A. I'm not sure what you're asking.</p>
<p style="text-align: right;">Page 28</p> <p>1 - Ray Santana -</p> <p>2 Q. I'm trying to summarize the kind</p> <p>3 of course work you took to get an understanding</p> <p>4 of the course work you took to obtain your</p> <p>5 current certification as a School Media</p> <p>6 Specialist. Is it your testimony today that</p> <p>7 you took Library Science courses?</p> <p>8 A. We took maybe one. The emphasis</p> <p>9 was heavy duty on the upcoming digital usage of</p> <p>10 information; the processing of it, also the</p> <p>11 retrieval of it, as well as the storage of it.</p> <p>12 Q. Did you have to take a Content</p> <p>13 Specialty Test as part of attaining your</p> <p>14 certification as a School Media Specialist?</p> <p>15 Tell me if I phrased that</p> <p>16 incorrectly. Was the name of that a Content</p> <p>17 Specialty Test?</p> <p>18 A. I don't recall.</p> <p>19 Q. Do you remember when you took a</p> <p>20 Content Specialty Test?</p> <p>21 A. It would have been before my</p> <p>22 permanent certification because that would be a</p> <p>23 requirement.</p> <p>24 Q. That was a Content Specialty Test</p> <p>25 as a School Media Specialist in Education</p>	<p style="text-align: right;">Page 29</p> <p>1 - Ray Santana -</p> <p>2 Communication; is that correct?</p> <p>3 A. I don't recall.</p> <p>4 Q. By the way, what does a School</p> <p>5 Media Specialist do; someone who's been</p> <p>6 certified as a School Media Specialist, what do</p> <p>7 they do?</p> <p>8 MR. GLASS: Objection to form.</p> <p>9 In what context?</p> <p>10 Q. In the Mount Vernon City School</p> <p>11 District what does a School Media Specialist</p> <p>12 do?</p> <p>13 A. I'm still not quite sure what</p> <p>14 you're getting at.</p> <p>15 Q. Have you ever served at the Mount</p> <p>16 Vernon City School District as a School Media</p> <p>17 Specialist?</p> <p>18 A. No.</p> <p>19 I'm certified as a Technology</p> <p>20 Teacher. Not certified; tenured. As such,</p> <p>21 it's difficult for me to answer because these</p> <p>22 are titles that are changing even as we're</p> <p>23 sitting here. So as far as what I've done with</p> <p>24 the District I don't know how they are titling</p> <p>25 it but it's integrated lessons with teachers</p>

<p style="text-align: right;">Page 30</p> <p>1 - Ray Santana -</p> <p>2 and with students in particular. I'll also</p> <p>3 work with adult students in career education</p> <p>4 programs and Special Needs students in</p> <p>5 integrating information and proper use of</p> <p>6 technology and various forms of technology,</p> <p>7 going as far as also programming animation.</p> <p>8 Primarily my focus was going to be</p> <p>9 with academics, how to develop a spreadsheet;</p> <p>10 how to use Excel, how to use Office Systems</p> <p>11 Suites, also how to evaluate programs.</p> <p>12 And that's why I'm hesitating in</p> <p>13 discussing this. I've done pretty much all</p> <p>14 with the District.</p> <p>15 Q. Okay, just forgive me if I've</p> <p>16 asked this question before.</p> <p>17 Do you remember when you attained</p> <p>18 your certification as a School Media</p> <p>19 Specialist?</p> <p>20 A. Permanent certification was</p> <p>21 conferred February 1, 2004 if I recall</p> <p>22 correctly.</p> <p>23 Q. By the way, do you possess a</p> <p>24 separate certification as a Library Media</p> <p>25 Specialist?</p>	<p style="text-align: right;">Page 31</p> <p>1 - Ray Santana -</p> <p>2 A. No; that was not -- that title</p> <p>3 didn't exist prior to February 2, 2004.</p> <p>4 Q. Did you ever possess a separate</p> <p>5 certification as a School Media Specialist in</p> <p>6 Library Communications?</p> <p>7 A. I'm not aware if I did or not.</p> <p>8 I'm just aware of the fact it was as a School</p> <p>9 Media Specialist.</p> <p>10 Q. I want to discuss, if I could, the</p> <p>11 fourth paragraph of your Notice of Claim at the</p> <p>12 bottom of the first page, then -- no, just at</p> <p>13 the bottom of the first page.</p> <p>14 A. (Witness complies.)</p> <p>15 Yes, sir.</p> <p>16 Q. You say that you obtained a</p> <p>17 permanent certification as a School Media</p> <p>18 Specialist and then you say, quote, which is</p> <p>19 the equivalent to the position of Library Media</p> <p>20 Specialist. What is the basis for this</p> <p>21 paragraph?</p> <p>22 A. The basis of this paragraph is</p> <p>23 after multiple discussions with the New York</p> <p>24 State Education Department Teacher</p> <p>25 Certification Division where they always</p>
<p style="text-align: right;">Page 32</p> <p>1 - Ray Santana -</p> <p>2 indicated they were one and the same.</p> <p>3 Prior to the realignment of</p> <p>4 teacher certifications and titles -- which</p> <p>5 occurred after February 2, 2004 -- that was</p> <p>6 always taken as such, one and the same.</p> <p>7 Q. When you say "after multiple</p> <p>8 discussions," do you remember when you had</p> <p>9 those discussions?</p> <p>10 A. I don't remember them off the top</p> <p>11 of my head. I can provide them in a detailed</p> <p>12 sheet.</p> <p>13 Q. Were these in-person discussions?</p> <p>14 A. No, unfortunately; they do not</p> <p>15 have in-person discussions.</p> <p>16 Q. Did you have these conversations</p> <p>17 by telephone?</p> <p>18 A. Yes, by telephone.</p> <p>19 Q. Did you have any written</p> <p>20 correspondence with the personnel at the New</p> <p>21 York State Education Department on this issue?</p> <p>22 A. I was told no written discussions</p> <p>23 would be given.</p> <p>24 Q. So you have no written</p> <p>25 correspondence with NYSED?</p>	<p style="text-align: right;">Page 33</p> <p>1 - Ray Santana -</p> <p>2 A. Other than the programming that</p> <p>3 they have, which basically is found at their</p> <p>4 website; that's it.</p> <p>5 Q. Can you tell me a little bit about</p> <p>6 -- I know you just told me briefly, but can you</p> <p>7 expound on the discussions you had with NYSED</p> <p>8 about when you referred to them saying the</p> <p>9 certification as School Media Specialist and a</p> <p>10 Library Media Specialist -- that they were</p> <p>11 known as sort of the same; can you tell me a</p> <p>12 little more about that?</p> <p>13 A. Other than the fact that I would</p> <p>14 speak to them, they could see my</p> <p>15 certifications; they could see the</p> <p>16 documentation that you needed to have those</p> <p>17 certifications.</p> <p>18 I was in a quandary because they</p> <p>19 would tell me they were one and the same. And</p> <p>20 actually, quite frankly, I was told by one of</p> <p>21 the -- I'm not quite sure what the titles are</p> <p>22 within the Certifications Offices -- that they</p> <p>23 never had anyone with such credentials apply</p> <p>24 for such a position. They were a little</p> <p>25 stymied as to why there was a problem.</p>

<p style="text-align: right;">Page 34</p> <p>1 - Ray Santana -</p> <p>2 Not only was I certified, but I</p> <p>3 had multiple certifications and Masters Degrees</p> <p>4 that kind of transcended beyond the course work</p> <p>5 they normally expect.</p> <p>6 Q. So you're saying that you were</p> <p>7 overqualified for the position?</p> <p>8 A. That is exactly what was ascribed.</p> <p>9 As I do not have anything other than</p> <p>10 remembering that was the discussion that's the</p> <p>11 best I can recall, sir.</p> <p>12 Q. So you referred to having multiple</p> <p>13 discussions with NYSED. Did have a discussion</p> <p>14 with any District personnel about whether</p> <p>15 you're certification as a School Media</p> <p>16 Specialist and a certification as a Library</p> <p>17 Media Specialist were equivalent?</p> <p>18 A. Yes.</p> <p>19 Please excuse me if I have the</p> <p>20 name incorrectly, but there was a Ms. Denise</p> <p>21 Gagne-Kurpiewski -- I'm not sure of the</p> <p>22 spelling; I don't want to be disrespectful and</p> <p>23 misspell it -- who happens to be the Head of</p> <p>24 the Human Resources Department; as well as Dr.</p> <p>25 Kenneth Hamilton, the Superintendent of</p>	<p style="text-align: right;">Page 35</p> <p>1 - Ray Santana -</p> <p>2 Schools.</p> <p>3 Q. And do you remember when you spoke</p> <p>4 about this with the Superintendent and Ms.</p> <p>5 Gagne-Kurpiewski?</p> <p>6 A. I don't remember the exact date;</p> <p>7 it was in the middle to late part of September</p> <p>8 2017.</p> <p>9 Q. Do you remember what happened in</p> <p>10 that conversation?</p> <p>11 A. I requested an appointment with</p> <p>12 the Superintendent to discuss the matter. He</p> <p>13 was gracious enough to find some time on his</p> <p>14 calendar to meet with me.</p> <p>15 I met with him, with Dr. Kenneth</p> <p>16 Hamilton in his office, and I explained to him</p> <p>17 about my situation; that being that I had</p> <p>18 already done my job at the alternative high</p> <p>19 school that was being downgraded, and that's</p> <p>20 why I was moved out.</p> <p>21 So there was a position as a</p> <p>22 Library Media Specialist and Librarian. I</p> <p>23 tried to discuss with him what the State had</p> <p>24 indicated to me, at which time the</p> <p>25 Superintendent requested for me to stand by a</p>
<p style="text-align: right;">Page 36</p> <p>1 - Ray Santana -</p> <p>2 moment while he called Ms. Denise</p> <p>3 Gagne-Kurpiewski, the Head of HR.</p> <p>4 In the intervening time that it</p> <p>5 took her to gather information or do whatever</p> <p>6 she was doing to come to the office I waited in</p> <p>7 the Superintendent's Office and he asked me if</p> <p>8 I was not happy with what I was doing. And at</p> <p>9 that point I pointed out to him that I was in a</p> <p>10 classroom without chairs and desks and nothing</p> <p>11 but a pile of garbage.</p> <p>12 Q. I'd like to work backwards and ask</p> <p>13 you some questions about what you just told me.</p> <p>14 A. Yes, sir.</p> <p>15 Q. You said you were working at an</p> <p>16 alternative high school?</p> <p>17 A. Yes.</p> <p>18 Q. What was the name of that</p> <p>19 alternative high school?</p> <p>20 A. It was Mandela slash Zollicoffer</p> <p>21 High School.</p> <p>22 Q. When did you work at the</p> <p>23 Mandela/Zollicoffer High School?</p> <p>24 A. The 2016-2017 school year.</p> <p>25 Q. So when you testified earlier that</p>	<p style="text-align: right;">Page 37</p> <p>1 - Ray Santana -</p> <p>2 you worked one year at a different institution</p> <p>3 and that you served the rest of your District</p> <p>4 time at Mount Vernon High School that was the</p> <p>5 Mandela/Zollicoffer High School; is that</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 It's a high school; this is the</p> <p>9 last year. From what I was made to understand</p> <p>10 it was not officially an alternative high</p> <p>11 school. Apparently New York State has a</p> <p>12 particular set of regulations, affirmations,</p> <p>13 and certifications for it to have been an</p> <p>14 alternative high school.</p> <p>15 Q. In what capacity did you work at</p> <p>16 the Mandela/Zollicoffer High School during the</p> <p>17 2016-2017 school year?</p> <p>18 A. I worked as a Librarian, School</p> <p>19 Media Specialist.</p> <p>20 A. Was that your official title</p> <p>21 there?</p> <p>22 A. I'm not quite sure what my</p> <p>23 official title would have been, but I did</p> <p>24 everything.</p> <p>25 Q. Let me ask you this way.</p>

<p style="text-align: right;">Page 38</p> <p>1 - Ray Santana -</p> <p>2 What were your duties there?</p> <p>3 A. I had to cull the collection, the</p> <p>4 physical collection. I also had to maintain</p> <p>5 the physical being of the library.</p> <p>6 Q. When you say "cull the physical</p> <p>7 collection" you're talking about the physical</p> <p>8 collection of what?</p> <p>9 A. We had primarily books. Reference</p> <p>10 books; encyclopedias; periodicals. Also I</p> <p>11 maintained -- I didn't want to interrupt.</p> <p>12 Q. Go ahead.</p> <p>13 A. I maintained the physical plant of</p> <p>14 the library.</p> <p>15 I also -- We had a number of</p> <p>16 computers and printers that I would maintain</p> <p>17 and teach subject areas with the students.</p> <p>18 At that time also I processed new</p> <p>19 orders for books and materials for the library,</p> <p>20 as well as at the school; I became the point</p> <p>21 person for that.</p> <p>22 And I also liaised with the</p> <p>23 teachers as far as their lessons plans and</p> <p>24 instructed them on how to do research as well</p> <p>25 for the course of studies they had for the</p>	<p style="text-align: right;">Page 39</p> <p>1 - Ray Santana -</p> <p>2 students.</p> <p>3 And I worked with the students</p> <p>4 sometimes individually, sometimes as a class.</p> <p>5 I instructed them on various Library Sciences.</p> <p>6 There was the tradition Science of how to</p> <p>7 research something using an encyclopedia or --</p> <p>8 What I mean by "traditional," I'm sorry for</p> <p>9 saying it this way, it's traditional in terms</p> <p>10 of physically holding and manipulating the</p> <p>11 material; where to get it; where to file it;</p> <p>12 where to put it. So I encouraged them to take</p> <p>13 books, but also I taught them about the</p> <p>14 electronic portals that are accepted and not</p> <p>15 accepted; the discernment of information.</p> <p>16 I'm really kind of condensing</p> <p>17 everything right now because it was across the</p> <p>18 board.</p> <p>19 Q. Did you ever receive a written job</p> <p>20 position or description of the position you</p> <p>21 were assigned to at the Mandela/Zollicoffer</p> <p>22 High School?</p> <p>23 A. I received a title. I do not</p> <p>24 remember the title.</p> <p>25 At the District there is a thing</p>
<p style="text-align: right;">Page 40</p> <p>1 - Ray Santana -</p> <p>2 called a "tab." I know I pushed the tab</p> <p>3 through that indicated I would be serving as --</p> <p>4 I don't recall what the tab said as far as a</p> <p>5 title; but that's all I can recall.</p> <p>6 Q. Did you ever ask to partake in</p> <p>7 responsibilities that maybe fell outside of</p> <p>8 your job description?</p> <p>9 A. Yes.</p> <p>10 Q. What were those things?</p> <p>11 A. I took notes at the weekly</p> <p>12 meetings held at the library by the</p> <p>13 administration with the teaching staff.</p> <p>14 I also had students -- when we had</p> <p>15 various holiday celebrations they were</p> <p>16 conducted in the library.</p> <p>17 The library became a magnet for</p> <p>18 the school once I got there. There were</p> <p>19 celebrations for teacher retirements and</p> <p>20 milestones.</p> <p>21 And I also assisted in the</p> <p>22 disbursement of the Regents tests and the safe</p> <p>23 collecting and monitoring of it. I would also</p> <p>24 be around to see that the tests were handled</p> <p>25 properly according to the New York State</p>	<p style="text-align: right;">Page 41</p> <p>1 - Ray Santana -</p> <p>2 standards for Regents.</p> <p>3 Q. Were there any other</p> <p>4 responsibilities that you discussed? Say like</p> <p>5 with teaching students, did you ask to teach</p> <p>6 various classes or were you assigned those</p> <p>7 classes?</p> <p>8 A. I was asked on one particular time</p> <p>9 by a Mr. Frank Gallo, who is the Literature,</p> <p>10 ELA -- which refers to English Language Arts --</p> <p>11 Supervisor for the District, he asked me to</p> <p>12 teach a class for evaluation purposes -- it's</p> <p>13 called an observation lesson -- with students.</p> <p>14 And I did so as per his request.</p> <p>15 Q. How many times did you teach</p> <p>16 lessons with students?</p> <p>17 A. It had to be at least -- depending</p> <p>18 on the class -- 30, 40 times in a class.</p> <p>19 Individually, that was on-going; it was almost</p> <p>20 two, three times a day easy.</p> <p>21 Q. I'm a little confused.</p> <p>22 You were asked to do this demo</p> <p>23 class by Frank Gallo; is that correct?</p> <p>24 A. Correct.</p> <p>25 Q. But besides that one demo class --</p>

<p style="text-align: right;">Page 42</p> <p>1 - Ray Santana -</p> <p>2 A. I'm sorry; I'll rephrase that.</p> <p>3 What I mean by "observation," it's</p> <p>4 a route towards your tenureship. Any position</p> <p>5 -- most in the School District required X</p> <p>6 amount of what was called formal observations</p> <p>7 where you present what you're going to be</p> <p>8 teaching, how you're going to be teaching the</p> <p>9 population of the class, what have you. Then</p> <p>10 you would perform it in front of observers.</p> <p>11 I was asked to do a formal</p> <p>12 observation in teaching these students, even</p> <p>13 those -- they were not my set students, they</p> <p>14 just happened to be a group of students they</p> <p>15 brought together.</p> <p>16 Q. Let me ask you this.</p> <p>17 When you worked as a School Media</p> <p>18 Specialist at Mandela/Zollicoffer High School</p> <p>19 were you appointed to that position on a</p> <p>20 probationary basis?</p> <p>21 A. Correct.</p> <p>22 Q. Were you seeking to be tenured per</p> <p>23 your assignment as a School Media Specialist at</p> <p>24 Mandela?</p> <p>25 A. I was seeking to be tenured as a</p>	<p style="text-align: right;">Page 43</p> <p>1 - Ray Santana -</p> <p>2 School Media Specialist in the District; it</p> <p>3 wasn't specifically for Mandela.</p> <p>4 Q. I want to circle back a little bit</p> <p>5 to when you had the discussion with Dr.</p> <p>6 Hamilton about becoming a Library Media</p> <p>7 Specialist.</p> <p>8 When did you actually express your</p> <p>9 interest to the District that you wanted to</p> <p>10 seek the position of Library Media Specialist?</p> <p>11 A. It had been for a couple years</p> <p>12 when it became there were positions available.</p> <p>13 Q. When did you first inform the</p> <p>14 District that you were looking to become a</p> <p>15 Library Media Specialist?</p> <p>16 A. I can't recall the date. It would</p> <p>17 have been somewhere around 2016 or so.</p> <p>18 Q. Did you express this interest to</p> <p>19 them after you had been appointed as a School</p> <p>20 Media Specialist at Mandela/Zollicoffer High</p> <p>21 School?</p> <p>22 A. No, I thought there was no need to</p> <p>23 because it was -- according to the</p> <p>24 certification by the State it was one and the</p> <p>25 same.</p>
<p style="text-align: right;">Page 44</p> <p>1 - Ray Santana -</p> <p>2 Q. Were you ever informed by anyone</p> <p>3 at the District that you had to -- Strike that</p> <p>4 question.</p> <p>5 Did you ever have a discussion</p> <p>6 with either Dr. Hamilton or actually any</p> <p>7 District Administrator about acquiring a</p> <p>8 certification as a Library Media Specialist?</p> <p>9 A. Yes.</p> <p>10 Q. With whom did you have such a</p> <p>11 discussion?</p> <p>12 A. With the Head of HR, Denise</p> <p>13 Gagne-Kurpiewski.</p> <p>14 Q. When did you have this</p> <p>15 conversation with her?</p> <p>16 A. If I recall correctly it would</p> <p>17 have been August 2017.</p> <p>18 Q. What did she say to you?</p> <p>19 A. At that time she said that I was</p> <p>20 not qualified because my licensure only allowed</p> <p>21 me to teach adults. Her exact words were If</p> <p>22 you want to do that I could go through the</p> <p>23 teacher certification website and apply for</p> <p>24 certification and start the process that way.</p> <p>25 Q. Did she encourage you to begin</p>	<p style="text-align: right;">Page 45</p> <p>1 - Ray Santana -</p> <p>2 that process?</p> <p>3 A. Correct.</p> <p>4 Q. Do you remember what you said to</p> <p>5 her; can you tell me more about that</p> <p>6 conversation?</p> <p>7 A. What I recall about that</p> <p>8 conversation is that Ms. Denise</p> <p>9 Gagne-Kurpiewski indicated to me there was such</p> <p>10 a dire need for Librarians if I were to</p> <p>11 complete the four courses of studies that would</p> <p>12 be required they would place me in that</p> <p>13 position, even in the middle of the school year</p> <p>14 if necessary. Because at that point I believe</p> <p>15 they were short over six Librarians for the</p> <p>16 School District.</p> <p>17 Q. Did you complete those courses?</p> <p>18 A. No, sir.</p> <p>19 Q. What were those courses, do you</p> <p>20 remember?</p> <p>21 A. They were dealing primarily with</p> <p>22 the technology of information, information</p> <p>23 retrieval, various group sites for the</p> <p>24 interchange of information, various usage of</p> <p>25 electronic library systems.</p>



<p style="text-align: right;">Page 46</p> <p>1 - Ray Santana -</p> <p>2 Q. Were there also just like Library</p> <p>3 Science courses?</p> <p>4 A. Not in the traditional way.</p> <p>5 Once again, when I refer to the</p> <p>6 "traditional way" it's the physical</p> <p>7 manifestation of holding a periodical or book.</p> <p>8 Q. Sure.</p> <p>9 A. But yes, in an electronic way.</p> <p>10 Q. Just to circle back; tell me if I</p> <p>11 have what she said correctly.</p> <p>12 She said if you completed that</p> <p>13 course work, then attained a certification as a</p> <p>14 Library Media Specialist, that you would be</p> <p>15 considered for a position of Library Media</p> <p>16 Specialist in the District?</p> <p>17 A. Her exact verbiage was I will</p> <p>18 place you in a position even in the middle of</p> <p>19 the school year; that's how desperate we are</p> <p>20 looking for Librarians.</p> <p>21 Q. If you completed the course work</p> <p>22 and got certification as a Library Media</p> <p>23 Specialist they would secure your position as a</p> <p>24 Library Media Specialist?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 47</p> <p>1 - Ray Santana -</p> <p>2 Can I give you a point of</p> <p>3 clarification?</p> <p>4 Q. Absolutely.</p> <p>5 That particular route she's</p> <p>6 expounding to is only a certificate -- a</p> <p>7 five-year certificate, not a permanent</p> <p>8 certification, not transitional, not a</p> <p>9 professional certification. That was only the</p> <p>10 route they came up with when they did a</p> <p>11 realignment of the teachers and certifications</p> <p>12 back in 2004 -- February 2004.</p> <p>13 Q. Who's the "they" you're referring</p> <p>14 to?</p> <p>15 A. The New York State Teacher</p> <p>16 Certification Department; the bureau I'm not</p> <p>17 quite sure.</p> <p>18 Q. You're not referring to the</p> <p>19 District, you're referring to NYSED?</p> <p>20 A. Correct, sir.</p> <p>21 Q. So you said you had a conversation</p> <p>22 with Denise Gagne-Kurpiewski around 2017?</p> <p>23 A. In her office.</p> <p>24 Q. Did you begin the process to</p> <p>25 attain -- even as you described it -- the</p>
<p style="text-align: right;">Page 48</p> <p>1 - Ray Santana -</p> <p>2 five-year certification?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Where did you do that?</p> <p>5 A. Through the University of Buffalo</p> <p>6 on-line.</p> <p>7 MR. GLASS: August 2017 is what he</p> <p>8 said.</p> <p>9 THE WITNESS: Correct.</p> <p>10 Q. And so you began to take courses</p> <p>11 through the University of Buffalo?</p> <p>12 A. Correct.</p> <p>13 Yes, sir; I'm sorry.</p> <p>14 Q. Do you remember which course you</p> <p>15 took?</p> <p>16 A. Not offhand.</p> <p>17 Q. Do you remember, did you complete</p> <p>18 any courses with the University of Buffalo?</p> <p>19 A. No, sir.</p> <p>20 Q. When did you begin taking those</p> <p>21 courses through the University of Buffalo?</p> <p>22 A. It would have been September,</p> <p>23 October 2017.</p> <p>24 Q. And why did you stop taking those</p> <p>25 courses; or did you stop taking those courses?</p>	<p style="text-align: right;">Page 49</p> <p>1 - Ray Santana -</p> <p>2 A. It became apparent, based upon</p> <p>3 discussions with other institutions of higher</p> <p>4 learning as well as with the University of</p> <p>5 Buffalo, that I would not only not be receiving</p> <p>6 permanent certification but they had no idea</p> <p>7 because of the uniqueness of my education level</p> <p>8 and certification what other requirement would</p> <p>9 be necessary for me other than a full Masters</p> <p>10 Degree.</p> <p>11 I pointed out to them of my</p> <p>12 discussions with NYSED Teacher Certification</p> <p>13 and they tried to get information from them as</p> <p>14 well; and they were not able to do so.</p> <p>15 Q. I'm a little --</p> <p>16 A. So the end product is nebulous at</p> <p>17 best.</p> <p>18 Q. I'm a little confused.</p> <p>19 First of all, you said you had a</p> <p>20 conversation with the University of Buffalo and</p> <p>21 with other higher education institutions. When</p> <p>22 you say "other" --</p> <p>23 A. Syracuse University. Specifically</p> <p>24 Queens College in Queens, New York; who had an</p> <p>25 excellent program.</p>

<p style="text-align: right;">Page 50</p> <p>1 - Ray Santana -</p> <p>2 Q. Which department at Queens</p> <p>3 College?</p> <p>4 A. They have an actual Library</p> <p>5 Science Division and they have a Certification</p> <p>6 Officer.</p> <p>7 Q. What did the Certification Officer</p> <p>8 at Queens College say?</p> <p>9 A. She said she couldn't find any</p> <p>10 information on it. Her exact words were You</p> <p>11 have more degrees than I do; I'm not quite sure</p> <p>12 what to do. I also spoke to the Head of that</p> <p>13 department.</p> <p>14 Q. What department?</p> <p>15 A. The Library Science Department for</p> <p>16 Queens College.</p> <p>17 I can provide you with dates</p> <p>18 and a quick synopsis in writing. I know that I</p> <p>19 have that written; there's so much information.</p> <p>20 Q. Sure.</p> <p>21 Obviously any documents regarding</p> <p>22 those conversations we'd ask you to preserve</p> <p>23 those documents.</p> <p>24 A. Yes, sir.</p> <p>25 Q. Do you remember, just from memory,</p>	<p style="text-align: right;">Page 51</p> <p>1 - Ray Santana -</p> <p>2 what the Head of the Library Science Department</p> <p>3 at Queens College said to you?</p> <p>4 A. Not offhand; I'd have to review</p> <p>5 the documentation, sir.</p> <p>6 Q. Who did you speak to at Syracuse</p> <p>7 University?</p> <p>8 A. I'd have to look also.</p> <p>9 Q. Do you remember what department</p> <p>10 you contacted at Syracuse University?</p> <p>11 A. They have a Library Science</p> <p>12 Department as well.</p> <p>13 Q. Do you remember when you had these</p> <p>14 conversations with Syracuse University and</p> <p>15 Queens College?</p> <p>16 A. It would have been multiple</p> <p>17 discussions over multiple periods of time. I</p> <p>18 would have to say between September right on</p> <p>19 through December 2017.</p> <p>20 Actually, beyond that. Because I</p> <p>21 was with UB right up to the third -- March</p> <p>22 2018.</p> <p>23 Q. What do you mean by you were "with</p> <p>24 the University of Buffalo through March of</p> <p>25 2018"?</p>
<p style="text-align: right;">Page 52</p> <p>1 - Ray Santana -</p> <p>2 A. I was still working on the course</p> <p>3 of studies while trying to assess where that</p> <p>4 was going to lead.</p> <p>5 At that point I decided nobody</p> <p>6 could give me a viable answer in writing that I</p> <p>7 was basically not doing -- I'm not quite sure</p> <p>8 what I was thinking of. Nobody did give me an</p> <p>9 answer because my situation was so unique</p> <p>10 everybody was dumbfounded.</p> <p>11 Q. So let me -- I'm little confused</p> <p>12 as to why your situation was unique. Tell me</p> <p>13 if I'm wrong.</p> <p>14 If you had gone and completed the</p> <p>15 course work and the certification requirement</p> <p>16 to become a Library Media Specialist wouldn't</p> <p>17 you have become a Library Media Specialist?</p> <p>18 A. It would have been a temporary</p> <p>19 certificate.</p> <p>20 Q. Whether temporary in your case --</p> <p>21 Let's go back to what the website says now.</p> <p>22 What did the website say to the best of your</p> <p>23 recollection?</p> <p>24 A. This was a five-year certificate.</p> <p>25 Q. I'm a little unfamiliar, sir;</p>	<p style="text-align: right;">Page 53</p> <p>1 - Ray Santana -</p> <p>2 please tell me. You're saying if you completed</p> <p>3 the Library Science course work --</p> <p>4 A. For the certification program;</p> <p>5 that would give me a certificate.</p> <p>6 Q. This was through the University of</p> <p>7 Buffalo?</p> <p>8 A. Right.</p> <p>9 Q. So you're saying you may have</p> <p>10 enrolled in a program that wouldn't have gotten</p> <p>11 you the certification you need to be become a</p> <p>12 Library Media Specialist?</p> <p>13 A. Correct.</p> <p>14 And the reason for that was</p> <p>15 because I already had three Masters Degrees,</p> <p>16 which intermingled with each other.</p> <p>17 They couldn't get a definite</p> <p>18 answer from the State either. So all that</p> <p>19 would qualify me for would be the</p> <p>20 certification, but that wouldn't give me full</p> <p>21 certification rights towards this.</p> <p>22 This falls -- They weren't the</p> <p>23 only ones; they just happened to stick longer</p> <p>24 than the rest of them who just threw up their</p> <p>25 hands.</p>



<p style="text-align: right;">Page 54</p> <p>1 - Ray Santana -</p> <p>2 They tried to get an answer from</p> <p>3 the State and the State wouldn't give them an</p> <p>4 answer. All they kept saying was I would</p> <p>5 qualify for the certificate, but I needed</p> <p>6 another Masters program.</p> <p>7 Q. How did you find out about the</p> <p>8 University of Buffalo program that you enrolled</p> <p>9 in?</p> <p>10 A. I literally did my research. I</p> <p>11 googled that job. And beyond googling I asked</p> <p>12 a former Librarian in the State of Connecticut</p> <p>13 and they referred me to a place. And I decided</p> <p>14 that it would be best if I did everything in</p> <p>15 New York State; it would be easier for them to</p> <p>16 obtain my records.</p> <p>17 Q. Did Denise Gagne-Kurpiewski</p> <p>18 suggest any programs to you that you could have</p> <p>19 signed up for to get that certification?</p> <p>20 A. The only one I recall was through</p> <p>21 the New York State Education Department; but</p> <p>22 not courses, the requirements.</p> <p>23 Q. You mean she referred you to the</p> <p>24 NYSED --</p> <p>25 A. Teacher Certification.</p>	<p style="text-align: right;">Page 55</p> <p>1 - Ray Santana -</p> <p>2 Q. And they provided you with a list</p> <p>3 of requirements necessary to become certified</p> <p>4 as a Library Media Specialist?</p> <p>5 A. Correct.</p> <p>6 Q. She didn't suggest any programs or</p> <p>7 institutions of higher learning to help get you</p> <p>8 there?</p> <p>9 A. No.</p> <p>10 Q. When you signed up with the</p> <p>11 University of Buffalo in September 2017 were</p> <p>12 you intent on engaging in the certification</p> <p>13 course work necessary to achieve a</p> <p>14 certification as a Library Media Specialist?</p> <p>15 A. Yes.</p> <p>16 Q. And the reason was stopped your</p> <p>17 program with the University of Buffalo was</p> <p>18 because you were unsure if that was the proper</p> <p>19 program for you to essentially complete that</p> <p>20 degree or complete that course work necessary</p> <p>21 to become certified in New York State as a</p> <p>22 Library Media Specialist; is that correct?</p> <p>23 A. I'm not quite sure of your</p> <p>24 question.</p> <p>25 Q. I'll rephrase.</p>
<p style="text-align: right;">Page 56</p> <p>1 - Ray Santana -</p> <p>2 A. I'm trying, sir.</p> <p>3 Q. No, please; it's not a problem.</p> <p>4 When you stopped participating in</p> <p>5 the program through the University of Buffalo</p> <p>6 it was because you were unsure that if you</p> <p>7 completed the program at the University of</p> <p>8 Buffalo -- essentially that course work was not</p> <p>9 going to help you become a Library Media</p> <p>10 Specialist?</p> <p>11 A. That course work would help me</p> <p>12 obtain a certificate.</p> <p>13 Q. So what was the reason why you</p> <p>14 decided not to pursue it?</p> <p>15 A. Essentially nobody could tell me</p> <p>16 whether I needed to get another Masters Degree</p> <p>17 from which I already possessed in doing Library</p> <p>18 Sciences.</p> <p>19 The crux of this whole difficulty</p> <p>20 in getting an answer was that prior to February</p> <p>21 2nd or 3rd of 2004 I was considered a</p> <p>22 Librarian; I was one and the same. I was told</p> <p>23 that on multiple occasions by the New York</p> <p>24 State Education Department Teacher</p> <p>25 Certification line.</p>	<p style="text-align: right;">Page 57</p> <p>1 - Ray Santana -</p> <p>2 After that not only did all the</p> <p>3 certifications change but the titles changed;</p> <p>4 they changed the requirements; they changed the</p> <p>5 -- I mean, while it would be analogous of --</p> <p>6 I'm a Special Needs Teacher right now. Now</p> <p>7 everything changed. They've change Special</p> <p>8 Needs and blocked them into subject areas.</p> <p>9 And also from what I was made to</p> <p>10 understand there are grade groups where you can</p> <p>11 be a Special Ed Teacher in Mathematics at the</p> <p>12 High School level covering ninth through -- or</p> <p>13 maybe eighth through twelfth.</p> <p>14 As a Special Needs teacher one of</p> <p>15 my certification was referred to as a common</p> <p>16 branch, otherwise known as Elementary. They no</p> <p>17 longer issue that; it's Pre-K through sixth.</p> <p>18 So you can understand that this</p> <p>19 definitely -- I don't know whether I'm a case</p> <p>20 study or just someone forgotten, but this was</p> <p>21 not going to give me anything other than a</p> <p>22 certificate that would guarantee that I could</p> <p>23 work in a position for five years; that's all.</p> <p>24 MR. GLASS: Let's take a break for</p> <p>25 a second.</p>

<p style="text-align: right;">Page 58</p> <p>1 - Ray Santana -  2 (Whereupon a break was taken from  3 11:20 a.m. to 11:33 a.m.)  4 Q. Mr. Santana --  5 A. Yes, sir.  6 Q. -- are you ready to go?  7 A. Yes, sir.  8 Q. I want to pick up where you left  9 off before the break. We were discussing your  10 enrollment in the program you were enrolled in  11 at the University of Buffalo.  12 When did you stop taking classes  13 at the University of Buffalo?  14 A. About March 2018.  15 Q. And did you complete any courses  16 between September 2017 and March 2018?  17 A. No.  18 Q. Did you enroll in any other  19 institution of higher learning to complete any  20 courses in Library Science to become certified  21 as a Library Media Specialist?  22 A. No.  23 Q. But you're aware that you need to  24 complete course work in Library Science in  25 order to become a certified Library Media</p>	<p style="text-align: right;">Page 59</p> <p>1 - Ray Santana -  2 Specialist; is that correct?  3 A. Can you --  4 Q. Are you aware that you need to  5 complete course work in Library Science in  6 order to become certified as a Library Media  7 Specialist?  8 A. No.  9 Q. Were you ever informed of the  10 certification requirement to become a Library  11 Media Specialist by the NYSED in writing?  12 A. Only a digital copy was sent of  13 their website indicating what the requirements  14 were. And that was to become a Library Media  15 Specialist under the new certification.  16 Q. You're saying that was on their  17 website?  18 A. Correct.  19 Q. Did they ever contact you?  20 A. Yes, they did.  21 Q. Do you remember when they  22 contacted you?  23 A. No, sir.  24 MR. GOLDSTEIN: I'd like to mark --  25 MR. GLASS: "They" being NYSED?</p>
<p style="text-align: right;">Page 60</p> <p>1 - Ray Santana -  2 THE WITNESS: Yes, "they" being  3 NYSED.  4 MR. GOLDSTEIN: Let's mark this as  5 Respondent's B.  6 (Document, Notice of Uncompleted  7 Requirements for Certification dated 8/21/2017,  8 marked for identification as Respondent's  9 Exhibit B.)  10 Q. Mr. Santana, I'd like to hand you  11 what's been marked as Respondent's Exhibit B.  12 Take a moment to review that, let me know when  13 you're finished, then I'd like to ask you a  14 couple of questions about it.  15 A. (Witness examines document.)  16 Q. Are you ready to answer some  17 questions about this document?  18 A. Yes, sir.  19 Q. Have you reviewed that document  20 that's been marked as Respondent's Exhibit B?  21 A. Yes, sir.  22 Q. Do you recognize that document?  23 A. Yes, sir.  24 Q. Is that a letter sent by NYSED to  25 you concerning Uncompleted Requirements for</p>	<p style="text-align: right;">Page 61</p> <p>1 - Ray Santana -  2 Certification as a Library Media Specialist?  3 A. Yes, sir.  4 Q. This is a letter dated August 21,  5 2017?  6 A. Correct.  7 Q. Do you now recall being informed  8 of these requirements to attain a certification  9 as a Library Media Specialist?  10 A. Yes, sir.  11 Q. Actually, do you recall being  12 informed of the certification requirements to  13 become a Library Media Specialist by NYSED on  14 August 21, 2017?  15 A. No, sir, I don't recall; but I do  16 recognize the document.  17 Q. As you can see, there are four  18 specified areas -- requirement areas to become  19 a certified Library Media Specialist. Do you  20 see the section in there with four bullet  21 points?  22 A. Yes, sir.  23 Q. Concerning the first bullet point,  24 that says Content Core - Library Science, then  25 it says 12 SH. Have you taken 12 credits of</p>

<p style="text-align: right;">Page 62</p> <p>1 - Ray Santana -</p> <p>2 course work in Library Science?</p> <p>3 A. Not that I recall.</p> <p>4 Q. Since this letter, since August</p> <p>5 21, 2017 have you completed any courses that</p> <p>6 would help to fulfill the Content Core</p> <p>7 requirement?</p> <p>8 A. No, sir.</p> <p>9 Q. Next is Content Specialty Test; do</p> <p>10 you see that second bullet point on this</p> <p>11 letter?</p> <p>12 A. Yes.</p> <p>13 Q. Have you taken a Content Specialty</p> <p>14 Test in the area of either Library Media</p> <p>15 Specialist or Safety Net Library Media</p> <p>16 Specialist?</p> <p>17 A. No, sir.</p> <p>18 Q. You've not taken a Content</p> <p>19 Specialty Test?</p> <p>20 A. Not that I can recall.</p> <p>21 Q. Do you see the third bullet point</p> <p>22 that says Workshop - Dignity for All Students</p> <p>23 Act?</p> <p>24 A. Yes.</p> <p>25 Q. Have you participated in a</p>	<p style="text-align: right;">Page 63</p> <p>1 - Ray Santana -</p> <p>2 workshop the Dignity for All Students Act?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Do you remember when you</p> <p>5 participated in that workshop?</p> <p>6 A. No, sir.</p> <p>7 Q. Then the fourth bullet point is</p> <p>8 School District Recommendation. Have you</p> <p>9 attained a recommendation by the School</p> <p>10 District?</p> <p>11 A. I was made to understand that the</p> <p>12 School District sent an electronic</p> <p>13 recommendation.</p> <p>14 Q. Okay, I want to take a second to</p> <p>15 -- Look at the Notice of Claim. Do you have</p> <p>16 that in front of you?</p> <p>17 A. (Search performed.)</p> <p>18 MR. GOLDSTEIN: By the way, at the</p> <p>19 end I'm going to ask for that copy of the</p> <p>20 Notice of Claim back because it has the sticker</p> <p>21 on it. I have a copy, so that's fine.</p> <p>22 Q. I want you to look specifically at</p> <p>23 the eighth paragraph of the Notice of Claim, so</p> <p>24 flip to the second page.</p> <p>25 A. (Witness complies.)</p>
<p style="text-align: right;">Page 64</p> <p>1 - Ray Santana -</p> <p>2 Q. That says that District's Counsel</p> <p>3 informed you that if you obtained a letter from</p> <p>4 NYSED that you had the requisite qualifications</p> <p>5 to become a Library Media Specialist the</p> <p>6 District would hire you for such a position; is</p> <p>7 that correct?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Did you ever obtain a letter from</p> <p>10 NYSED stating that you had the qualifications</p> <p>11 to become a Library Media Specialist?</p> <p>12 A. No, sir.</p> <p>13 Q. I then want to talk about the next</p> <p>14 paragraph, Paragraph 9 of the Notice of Claim.</p> <p>15 Do you recall having a</p> <p>16 conversation with anyone from NYSED in March</p> <p>17 2019 regarding whether you were eligible or</p> <p>18 certified to become a Library Media Specialist?</p> <p>19 A. I remember the date, I remember</p> <p>20 the person I spoke to, but it was not discussed</p> <p>21 that I was eligible for a Library Media</p> <p>22 Specialist.</p> <p>23 Q. Are you saying --</p> <p>24 A. I don't recall that.</p> <p>25 What I do recall is that the</p>	<p style="text-align: right;">Page 65</p> <p>1 - Ray Santana -</p> <p>2 individual affirmed that under the old</p> <p>3 regulations I was considered a Librarian, one</p> <p>4 and the same as a School Media Specialist. And</p> <p>5 I recorded that conversation.</p> <p>6 Q. How did you record that</p> <p>7 conversation?</p> <p>8 A. I recorded it using two electronic</p> <p>9 devices; one was a Samsung Galaxy5 and the</p> <p>10 other one an electronic recorder.</p> <p>11 Q. Do you still have copies of that</p> <p>12 recording?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And do you remember who you spoke</p> <p>15 to at NYSED?</p> <p>16 A. My recollection was that the</p> <p>17 individual who identified himself as a</p> <p>18 Certification Officer only referred to his name</p> <p>19 as Matt F, as in Frank.</p> <p>20 Q. By what means did you speak to</p> <p>21 Matt F?</p> <p>22 A. I'm sorry?</p> <p>23 Q. Did you speak with him over the</p> <p>24 telephone?</p> <p>25 A. Yes, sir.</p>

<p style="text-align: right;">Page 66</p> <p>1 - Ray Santana -</p> <p>2 Q. What did he say to you?</p> <p>3 A. I provided the transcript for that</p> <p>4 with the New York Human Rights Division. I do</p> <p>5 not recall the exact verbiage. I also provided</p> <p>6 the electronic recording of the conversation as</p> <p>7 it was occurring. And at the end when I hung</p> <p>8 up I do recall memorializing the recording by</p> <p>9 stating the date, and time, and who I spoke to,</p> <p>10 and my name.</p> <p>11 Q. Did you talk to anyone about this</p> <p>12 conversation?</p> <p>13 A. My wife; and to the best of my</p> <p>14 knowledge -- my recollection, my attorney.</p> <p>15 Q. You referred to having composed</p> <p>16 and providing a transcript of that conversation</p> <p>17 with NYSED. Do you remember when you composed</p> <p>18 that transcript?</p> <p>19 A. No, sir.</p> <p>20 Q. Was any part of the conversation</p> <p>21 you had with NYSED omitted from that</p> <p>22 transcript?</p> <p>23 A. Not that I'm aware of.</p> <p>24 When I provided that transcript I</p> <p>25 indicated that I did as best as I could.</p>	<p style="text-align: right;">Page 67</p> <p>1 - Ray Santana -</p> <p>2 MR. GOLDSTEIN: I'd like to mark</p> <p>3 this as Respondent's Exhibit C, please.</p> <p>4 (Document, Transcript of Telephone</p> <p>5 Conversation Held on 3/14/19, marked for</p> <p>6 identification as Respondent's Exhibit C.)</p> <p>7 Q. I'm handing you what's been marked</p> <p>8 as Respondent's C. Take a moment to review it,</p> <p>9 then let me know when you're finished reviewing</p> <p>10 it, then I'd like to ask you some questions</p> <p>11 about it.</p> <p>12 (Witness examines document.)</p> <p>13 A. Yes, sir.</p> <p>14 Q. Did you review this document</p> <p>15 that's marked as Respondent's Exhibit C?</p> <p>16 A. Yes.</p> <p>17 Q. Do you recognize that document?</p> <p>18 A. Yes, sir.</p> <p>19 Q. That transcript was developed</p> <p>20 pursuant to a conversation with an individual</p> <p>21 named Matt F, who is employee of NYSED?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Is this transcript a complete and</p> <p>24 accurate representation of the conversation you</p> <p>25 had with this individual on March 14, 2019?</p>
<p style="text-align: right;">Page 68</p> <p>1 - Ray Santana -</p> <p>2 A. To the best of my knowledge, yes.</p> <p>3 Q. I wanted to ask you specifically</p> <p>4 about what we've discussed.</p> <p>5 You were saying that your</p> <p>6 certification as a School Media Specialist is</p> <p>7 one and the same as certification as a Library</p> <p>8 Media Specialist. I was wondering if you could</p> <p>9 point to me on the transcript where Matt F says</p> <p>10 that.</p> <p>11 A. (Witness examines document.)</p> <p>12 Q. I'll refer you to the second page</p> <p>13 of this transcript.</p> <p>14 A. (Witness complies.)</p> <p>15 Q. Do you contend that the</p> <p>16 certification you attained in 2004 as a School</p> <p>17 Media Specialist "grandfathers" you -- to use a</p> <p>18 phrase you've previously used -- to essentially</p> <p>19 attain certification as a Library Media</p> <p>20 Specialist?</p> <p>21 A. I'm sorry, sir?</p> <p>22 Q. Do you contend that your</p> <p>23 certification you attained in 2004 for a School</p> <p>24 Media Specialist grandfathers you into becoming</p> <p>25 or getting certified as a Library Media</p>	<p style="text-align: right;">Page 69</p> <p>1 - Ray Santana -</p> <p>2 Specialist?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Where on this transcript does the</p> <p>5 individual from NYSED say that your</p> <p>6 certification as a School Media Specialist</p> <p>7 grandfathers you into becoming a Library Media</p> <p>8 Specialist, that essentially the certifications</p> <p>9 are equivalent?</p> <p>10 A. The third Ray down says the</p> <p>11 following:</p> <p>12 RAY: Was the old certification</p> <p>13 sufficient to work as a Librarian.</p> <p>14 MATT F: Well yeah that's that's</p> <p>15 the old certification...it all depends on which</p> <p>16 employer wants. If they if they want the new</p> <p>17 recertification -- unintelligible -- if the old</p> <p>18 certification is fine for them that's it.</p> <p>19 RAY: The only indication they</p> <p>20 gave that it would be fine for them if we just</p> <p>21 got something in writing.</p> <p>22 MATT F: We do not write anything</p> <p>23 --</p> <p>24 I'm sorry; I'll rephrase.</p> <p>25 MATT F: A, we don't write</p>

<p style="text-align: right;">Page 70</p> <p>1 - Ray Santana -</p> <p>2 anything and B, they can always check the</p> <p>3 teacher site they can always look you up good</p> <p>4 you have permanent certification.</p> <p>5 RAY: Okay so if I get this</p> <p>6 straight because I'm going to have to go back</p> <p>7 to them again we're going back and forth about</p> <p>8 this my certification as a School Media</p> <p>9 Specialist is dated on the 1st of February 2004</p> <p>10 before this realignment at that time I could</p> <p>11 work as a Librarian according to that</p> <p>12 certification.</p> <p>13 MATT F: Yes.</p> <p>14 Q. Okay, I want to just talk about</p> <p>15 the passage before that. Go to the third</p> <p>16 paragraph from the top on the second page where</p> <p>17 Matt F, the individual from NYSED, says that</p> <p>18 your 2004 certification as a School Media</p> <p>19 Specialist does not grandfather you into</p> <p>20 becoming a certified Library Media Specialist.</p> <p>21 A. What?</p> <p>22 MR. GLASS: Is there a question?</p> <p>23 MR. GOLDSTEIN: Yes.</p> <p>24 A. I don't understand the question.</p> <p>25 Q. Sure.</p>	<p style="text-align: right;">Page 71</p> <p>1 - Ray Santana -</p> <p>2 It was your contention a moment</p> <p>3 ago that your certification you attained in</p> <p>4 2004 as a School Media Specialist grandfathers</p> <p>5 you into becoming a certified Library Media</p> <p>6 Specialist. I'm asking you, Did this</p> <p>7 individual from NYSED agree with your</p> <p>8 assessment?</p> <p>9 A. All he --</p> <p>10 MR. GLASS: I'm going to object.</p> <p>11 I think that the documents speaks for itself.</p> <p>12 That says "there is no such thing as</p> <p>13 grandfathered in." That might mean the term</p> <p>14 didn't exist. I don't know that it's fair to</p> <p>15 ask him about NYSED's recognition of the word.</p> <p>16 He did say something in the other</p> <p>17 paragraph that kind of speaks for itself as to</p> <p>18 what his understanding was.</p> <p>19 Q. Let's go to the next paragraph, if</p> <p>20 you don't mind, to where the individual from</p> <p>21 NYSED says that it all depends on what the</p> <p>22 employer wants, if they want the new</p> <p>23 recertification.</p> <p>24 Do you believe that it was</p> <p>25 essentially the position of NYSED that it was</p>
<p style="text-align: right;">Page 72</p> <p>1 - Ray Santana -</p> <p>2 within the District's discretion as to what</p> <p>3 certification was necessary for an employee of</p> <p>4 the Mount Vernon City School District to hold a</p> <p>5 position as a Library Media Specialist?</p> <p>6 A. I'm not quite sure what the</p> <p>7 question is.</p> <p>8 Q. Would you interpret this portion</p> <p>9 of this transcript where he says, quote, it all</p> <p>10 depends which employer wants if they want the</p> <p>11 new recertification -- unintelligible -- if the</p> <p>12 old certification is fine for them that's it,</p> <p>13 do you understand that paragraph to mean that</p> <p>14 if the Mount Vernon City School District</p> <p>15 required that employees who wished to become a</p> <p>16 Library Media Specialist have the new</p> <p>17 certification was that within the discretion --</p> <p>18 meaning the choice -- of the Mount Vernon City</p> <p>19 School District to require that of District</p> <p>20 employees?</p> <p>21 A. No.</p> <p>22 Q. What do you think this means?</p> <p>23 A. The way I'm reading it he's</p> <p>24 dancing around the issue because I could work</p> <p>25 -- he acknowledged that I could work as a</p>	<p style="text-align: right;">Page 73</p> <p>1 - Ray Santana -</p> <p>2 Librarian under the old certification.</p> <p>3 What that transcript is was taken</p> <p>4 from a recording that I got, because I have</p> <p>5 been receiving the same information in various</p> <p>6 ways from other Certification Officers, that</p> <p>7 they were one and the same as described.</p> <p>8 The difference between this and my</p> <p>9 other discussions was that I actually recorded</p> <p>10 this. Even when I recorded this he was very</p> <p>11 evasive in answering questions. There was a</p> <p>12 lot of pausing in between.</p> <p>13 That's the best that I can recall</p> <p>14 of it.</p> <p>15 Q. Do you believe that this statement</p> <p>16 where it says it all depends basically on what</p> <p>17 the employer wants is an inaccurate</p> <p>18 representation of the position of NYSED?</p> <p>19 A. I'm not quite sure what you mean.</p> <p>20 Q. You testified a moment ago that</p> <p>21 the individual you spoke with that you recorded</p> <p>22 the conversation with was being evasive.</p> <p>23 Do you believe that statement here</p> <p>24 about -- basically where he appears to say that</p> <p>25 the District has some sort of discretion is an</p>



<p style="text-align: right;">Page 74</p> <p>1 - Ray Santana -</p> <p>2 inaccurate understanding of NYSED requirements</p> <p>3 with respect to your certification?</p> <p>4 A. I think it's inaccurate.</p> <p>5 Q. Why do you think it's inaccurate?</p> <p>6 A. Because, as I pointed out before,</p> <p>7 in previous discussions with other</p> <p>8 Certification Officers, not just Matt F, they</p> <p>9 were indicating that a School Media Specialist</p> <p>10 and Librarian were always taken as one and the</p> <p>11 same.</p> <p>12 All this is a synopsis of an</p> <p>13 actual recorded conversation. My belief as to</p> <p>14 this is the interpretation had been pretty</p> <p>15 consistent that they were one and the same.</p> <p>16 Q. Do you believe then that the</p> <p>17 District doesn't have the choice as to what</p> <p>18 certifications it requires of persons who want</p> <p>19 to be employed as a Library Media Specialist at</p> <p>20 the Mount Vernon City School District?</p> <p>21 A. My certification was given by the</p> <p>22 State of New York and that's what the District</p> <p>23 can go by. And my certification prior to the</p> <p>24 realignment in '04 would have allowed me to</p> <p>25 work as a Librarian. And that is what the</p>	<p style="text-align: right;">Page 75</p> <p>1 - Ray Santana -</p> <p>2 Certification Officers have been pretty</p> <p>3 consistent about.</p> <p>4 Q. But you're saying this particular</p> <p>5 passage regarding the discretion of the School</p> <p>6 District is inconsistent with the discussions</p> <p>7 you had -- other discussions you had with</p> <p>8 NYSED; is that right?</p> <p>9 A. I don't know.</p> <p>10 Q. Well, I'm asking you.</p> <p>11 A. I don't understand the question.</p> <p>12 Q. You're saying you had consistent</p> <p>13 discussions with persons at NYSED who were</p> <p>14 saying that your certification as a School</p> <p>15 Media Specialist was the equivalent to a</p> <p>16 certification as a Library Media Specialist; is</p> <p>17 that correct?</p> <p>18 A. That they have said the same thing</p> <p>19 over and over again. They never said</p> <p>20 "equivalent"; what they said more than once was</p> <p>21 "it was one and the same."</p> <p>22 Q. Can we stipulate that "equivalent"</p> <p>23 and "one and the same" mean the same thing?</p> <p>24 A. I guess so.</p> <p>25 Q. I'm trying to figure out the</p>
<p style="text-align: right;">Page 76</p> <p>1 - Ray Santana -</p> <p>2 difference between the two.</p> <p>3 A. I'm only stating what they said.</p> <p>4 I don't recall them ever saying it's the</p> <p>5 equivalent.</p> <p>6 Q. When you heard this statement that</p> <p>7 essentially it's within the employers</p> <p>8 discretion what certification they required</p> <p>9 when someone wanted to become a Library Media</p> <p>10 Specialist at the Mount Vernon City School</p> <p>11 District is that statement different from</p> <p>12 statements from NYSED in other conversations</p> <p>13 you had with them?</p> <p>14 A. Yes.</p> <p>15 First of all, this Library Media</p> <p>16 Specialist title didn't exist prior to 2004. I</p> <p>17 only even become vaguely aware that it existed</p> <p>18 only about four, five years ago.</p> <p>19 And as far as my grandfathering, I</p> <p>20 don't know whether it's a legal term or not,</p> <p>21 but that would indicate that all my previous --</p> <p>22 all my certifications are null and void because</p> <p>23 after the alignment the title could have</p> <p>24 changed and that would have meant that I wasn't</p> <p>25 certified.</p>	<p style="text-align: right;">Page 77</p> <p>1 - Ray Santana -</p> <p>2 Q. Okay, I'd like to move on to the</p> <p>3 tenth paragraph of your Notice of Claim at the</p> <p>4 bottom of the second page where it says that</p> <p>5 you informed the District's Counsel on April</p> <p>6 15th of your conversation with the NYSED</p> <p>7 representative through his own Counsel.</p> <p>8 When you referred to "his</p> <p>9 conversation with the NYSED representative" are</p> <p>10 you referring to the conversation as reflected</p> <p>11 in the transcript marked as Respondent's C?</p> <p>12 A. I'm referring to recording the</p> <p>13 conversation. I would have -- I think I would</p> <p>14 have done the transcript sometime afterwards.</p> <p>15 Q. So the tenth paragraph of your</p> <p>16 Notice of Claim is referring to the</p> <p>17 conversation you had with Matt F on March 14,</p> <p>18 2019; is that correct?</p> <p>19 A. That I had recorded the</p> <p>20 conversation, yes.</p> <p>21 Q. So what did the April 15, 2019</p> <p>22 correspondence say?</p> <p>23 A. That I have gotten in touch. That</p> <p>24 I had recorded -- gotten in touch with the --</p> <p>25 All I can recall is that I had gotten in touch</p>

<p style="text-align: right;">Page 78</p> <p>1 - Ray Santana -</p> <p>2 with NYSED and they confirmed that it was one</p> <p>3 and the same as being a Librarian.</p> <p>4 MR. GLASS: I assume you have this</p> <p>5 because I'm sure we gave you the E-mail that</p> <p>6 was sent to Mr. Christophe. I think it speaks</p> <p>7 for itself. I wrote it, so --</p> <p>8 MR. GOLDSTEIN: Okay.</p> <p>9 MR. GLASS: -- I assume you have a</p> <p>10 copy of it. You're asking him what was written</p> <p>11 in the E-mail to Mr. Christophe?</p> <p>12 MR. GOLDSTEIN: I'm asking him to</p> <p>13 summarize his impressions of that</p> <p>14 correspondence.</p> <p>15 MR. GLASS: It's an E-mail I wrote.</p> <p>16 Q. Based on the eleventh paragraph of</p> <p>17 your Notice of Claim, what were you impressions</p> <p>18 of what the District Counsel informed you and</p> <p>19 your Counsel about your conversation with the</p> <p>20 official at NYSED?</p> <p>21 MR. GLASS: Note my objection.</p> <p>22 You have the actual evidence. I</p> <p>23 don't know why impressions matter or what the</p> <p>24 relevance is.</p> <p>25 To the extent that you understand</p>	<p style="text-align: right;">Page 79</p> <p>1 - Ray Santana -</p> <p>2 you can answer.</p> <p>3 Q. Did you read the correspondence</p> <p>4 sent by District Counsel on April 18, 2019?</p> <p>5 A. I don't recall it.</p> <p>6 Q. I want you to flip back to the</p> <p>7 first page of the Notice of Claim; so back to</p> <p>8 the front.</p> <p>9 A. (Witness complies.)</p> <p>10 Q. It says in the very first</p> <p>11 paragraph where you're stating your claims</p> <p>12 against the Respondents -- this is one, two,</p> <p>13 three -- the fourth line down, it says</p> <p>14 "discriminatory." What is the basis of this</p> <p>15 claim that the Respondents acted</p> <p>16 discriminatorily?</p> <p>17 MR. GLASS: Note my objection as</p> <p>18 that's a legal term that's chosen by Counsel.</p> <p>19 Q. Do you believe that you've been</p> <p>20 discriminated against by the Mount Vernon City</p> <p>21 School District?</p> <p>22 A. In what manner?</p> <p>23 Q. In the context through which</p> <p>24 you've brought a Notice of Claim saying that</p> <p>25 you haven't been hired as a Library Media</p>
<p style="text-align: right;">Page 80</p> <p>1 - Ray Santana -</p> <p>2 Specialist.</p> <p>3 A. Uh-huh.</p> <p>4 Q. By "uh-huh" do you mean yes?</p> <p>5 A. I'm terribly sorry, sir. I'm just</p> <p>6 getting a little bit tired. I'm sorry.</p> <p>7 Q. Do you need to take a break?</p> <p>8 A. No; it would do no good at this</p> <p>9 point.</p> <p>10 Q. You're free to take a break.</p> <p>11 A. No, my medication is wearing off;</p> <p>12 my pain medication.</p> <p>13 Q. Just let me know if you need to</p> <p>14 take a break, please.</p> <p>15 Back to where we started.</p> <p>16 You filed a Notice of Claim</p> <p>17 claiming that the District didn't hire you as a</p> <p>18 Library Media Specialist. In your Notice of</p> <p>19 Claim it says that the District acted in</p> <p>20 discriminatory ways.</p> <p>21 I'm asking you, do you believe</p> <p>22 that you have been discriminated against by the</p> <p>23 Mount Vernon City School District?</p> <p>24 A. Yes, I do.</p> <p>25 Q. And on what basis do you claim</p>	<p style="text-align: right;">Page 81</p> <p>1 - Ray Santana -</p> <p>2 that you've been discriminated against by the</p> <p>3 Mount Vernon City School District?</p> <p>4 A. On the basis of the following --</p> <p>5 Q. Okay.</p> <p>6 A. -- age, gender, national origin,</p> <p>7 disability -- (Indicating.) That's all I can</p> <p>8 think of offhand.</p> <p>9 Q. What is the basis of your</p> <p>10 allegation that the Mount Vernon City School</p> <p>11 District discriminated against you on the basis</p> <p>12 of age?</p> <p>13 A. I'm 63-years-old and my</p> <p>14 assignments have gotten progressively worse as</p> <p>15 far as the students that I need to deal with.</p> <p>16 And I'm not able to go beyond that</p> <p>17 right now.</p> <p>18 Q. If you could, please turn to the</p> <p>19 sixth paragraph of your Notice of Claim.</p> <p>20 A. (Witness complies.)</p> <p>21 Q. If look at the last sentence it</p> <p>22 says Upon information and belief, the District</p> <p>23 has hired four younger females for the Library</p> <p>24 Media Specialist during the most recent summer</p> <p>25 of 2018.</p>



<p style="text-align: right;">Page 82</p> <p>1 - Ray Santana -</p> <p>2 Who are the four younger females?</p> <p>3 A. I'm not privy to that information</p> <p>4 because it is with the District.</p> <p>5 Q. So you don't know who the four</p> <p>6 younger females are?</p> <p>7 A. I couldn't tell you their names.</p> <p>8 I couldn't identify them if I saw them</p> <p>9 in-person.</p> <p>10 Q. Do you know what certifications</p> <p>11 the four younger females possess? Do you know</p> <p>12 if the four younger females possess the same</p> <p>13 certifications you do as a School Media</p> <p>14 Specialist?</p> <p>15 A. No, I do not.</p> <p>16 Q. Do you know if they -- the four</p> <p>17 younger females -- possess a certification as a</p> <p>18 Library Media Specialist?</p> <p>19 A. No, I do not.</p> <p>20 Q. Have the District Administrators</p> <p>21 made any age related comments to you?</p> <p>22 A. Comments, no.</p> <p>23 Q. Have District employees ever made</p> <p>24 any age related comments to you?</p> <p>25 A. Not that I can recall.</p>	<p style="text-align: right;">Page 83</p> <p>1 - Ray Santana -</p> <p>2 Q. You testified a moment ago that</p> <p>3 you were discriminated against based on gender.</p> <p>4 What's the basis for that testimony?</p> <p>5 A. Currently all of the Librarians in</p> <p>6 the District are females, when I was the only</p> <p>7 male working as a Librarian.</p> <p>8 There was another male and they</p> <p>9 basically got rid of him by the end of the</p> <p>10 school year. They had already given him notice</p> <p>11 prior to that.</p> <p>12 To the best of my knowledge --</p> <p>13 that's what I was told -- that individual is no</p> <p>14 longer employed by the District.</p> <p>15 Q. Do you believe that his employment</p> <p>16 was terminated?</p> <p>17 A. That's what I was made to</p> <p>18 understand.</p> <p>19 Q. Do you remember the name of that</p> <p>20 employee?</p> <p>21 A. No; but the District should be</p> <p>22 able to locate it because it was happening</p> <p>23 during the same school year I worked at the</p> <p>24 alternative high school.</p> <p>25 Q. Do you believe that the District</p>
<p style="text-align: right;">Page 84</p> <p>1 - Ray Santana -</p> <p>2 didn't want to hire Library Media Specialists</p> <p>3 who are men?</p> <p>4 A. I was made to understand that the</p> <p>5 individual that had been hired by the District</p> <p>6 already had experience working with school</p> <p>7 systems in New York City.</p> <p>8 Q. Has anyone -- any District</p> <p>9 Administrator ever made any sort of gender</p> <p>10 related comments to you?</p> <p>11 A. Not that I can recall.</p> <p>12 Q. Has any District employee made any</p> <p>13 gender related comments to you?</p> <p>14 A. I do not recall the exact date or</p> <p>15 verbiage. I recall being at a meeting with</p> <p>16 some of the Librarians for professional</p> <p>17 development. And they were happy to see me</p> <p>18 because I would interject a different</p> <p>19 perspective of how to solve a particular</p> <p>20 problem that was being presented.</p> <p>21 Q. How does that relate to your being</p> <p>22 a male?</p> <p>23 A. That a man's perspective is going</p> <p>24 to be different.</p> <p>25 Q. So they valued your perspective as</p>	<p style="text-align: right;">Page 85</p> <p>1 - Ray Santana -</p> <p>2 a man?</p> <p>3 A. Correct.</p> <p>4 Q. Do you remember when that meeting</p> <p>5 happened?</p> <p>6 A. It would have been a professional</p> <p>7 development meeting at one of the Elementary</p> <p>8 Schools. I'm sorry; at the Middle School.</p> <p>9 Q. Do you remember who said that?</p> <p>10 A. No.</p> <p>11 Q. Besides that one example were</p> <p>12 there any other gender related comments made to</p> <p>13 you during your time at the District?</p> <p>14 A. No, sir; but there were many</p> <p>15 actions to that effect.</p> <p>16 Q. Like what?</p> <p>17 A. I believe in September '17 I was</p> <p>18 assigned at the beginning of the school year to</p> <p>19 Room 225. And at that time when I got to the</p> <p>20 room there were no desks; no chairs; it was</p> <p>21 disheveled; there was a pile of trash. And I</p> <p>22 tried to soldier on as best I could.</p> <p>23 When I went to see the</p> <p>24 Superintendent regarding the librarianship he</p> <p>25 had questioned me in his office if I was not</p>

<p style="text-align: right;">Page 86</p> <p>1 - Ray Santana -</p> <p>2 happy with what I was doing. And I indicated</p> <p>3 to him that at that point in time I was in a</p> <p>4 room without chairs and a desk and trash.</p> <p>5 And he called the of Principal</p> <p>6 Mount Vernon High School, Mr. Gonzalez, right</p> <p>7 there and then and spoke with him for a few</p> <p>8 minutes and said You need to see Mr. Gonzalez.</p> <p>9 He says you're in the wrong room.</p> <p>10 As soon as I got back to the High</p> <p>11 School I went to Mr. Gonzalez to speak to him</p> <p>12 and he was very, very angry and agitated. I</p> <p>13 was in his office and he told me that I had</p> <p>14 been going to the wrong room. I tried to</p> <p>15 present paperwork to the effect that every day</p> <p>16 my assignments were being sent that I was</p> <p>17 supposed to report to that room.</p> <p>18 Mr. Gonzalez told me that Room 236</p> <p>19 was my room, to go there right now. I took my</p> <p>20 paperwork -- as I said subsequently when I</p> <p>21 wrote the E-mail -- I was fumbling; I had a</p> <p>22 cane and a large stack of paperwork with me.</p> <p>23 When I went to the room that he</p> <p>24 directed me to the room was completely set up</p> <p>25 already and being used by another teacher,</p>	<p style="text-align: right;">Page 87</p> <p>1 - Ray Santana -</p> <p>2 Angela Agosto; and it showed clearly on her</p> <p>3 schedule that she was to be instructing in that</p> <p>4 classroom.</p> <p>5 I apprised her of my conversation</p> <p>6 with Mr. Gonzalez and, of course, she was very</p> <p>7 upset. She subsequently gave me her scheduling</p> <p>8 that required her to go not only to more than</p> <p>9 one classroom but also on the other side of the</p> <p>10 building to be teaching. So she had to give up</p> <p>11 a fully equipped and fully set up classroom.</p> <p>12 Within a little more than three</p> <p>13 weeks Principal Gonzalez assigned Ms. Lillian</p> <p>14 Ferrell, a teacher even more senior in age and</p> <p>15 tenure than myself, to that very Room 225.</p> <p>16 Once again she found no work computer, a very</p> <p>17 little desk, and trash.</p> <p>18 So it's become patently obvious</p> <p>19 that as senior members of the teaching</p> <p>20 community we were being singled out in our</p> <p>21 assignments.</p> <p>22 And she was also given an</p> <p>23 assignment, as I was, for that year with</p> <p>24 children that had severe academic, emotional,</p> <p>25 and psychological problems.</p>
<p style="text-align: right;">Page 88</p> <p>1 - Ray Santana -</p> <p>2 Q. Who assigned you -- I'm sorry.</p> <p>3 Tell me the name of the other teachers. It was</p> <p>4 Ms. Angela Augusto and who?</p> <p>5 A. Ms. Lillian Ferrell;</p> <p>6 F-E-R-R-E-L-L.</p> <p>7 Q. I apologize.</p> <p>8 A. She was a senior teacher that was</p> <p>9 sent over to Room 225 once I was told to go to</p> <p>10 Room 236. And Ms. Angela Agosto -- I believe</p> <p>11 it's spelled A-G-O-S-T-O -- she was the</p> <p>12 occupant of the room; and effectively I took</p> <p>13 over the room and she was ejected from the</p> <p>14 room.</p> <p>15 Q. Is Ms. Ferrell still in Room 225?</p> <p>16 A. To the best of my knowledge she</p> <p>17 was reassigned to work with what you call life</p> <p>18 skill children. Life skill children students</p> <p>19 are very, very low performing with physical and</p> <p>20 mental handicaps. And I have not seen her any</p> <p>21 longer in the building.</p> <p>22 Q. I'd like you to just tell me if</p> <p>23 I'm off base here.</p> <p>24 If you go to the seventh paragraph</p> <p>25 of your Notice of Claim you're saying that some</p>	<p style="text-align: right;">Page 89</p> <p>1 - Ray Santana -</p> <p>2 things got tougher, correct; you're</p> <p>3 characterizing that as tougher assignments?</p> <p>4 When you say that you've been "assigned to</p> <p>5 teach in a dangerous environment" are you</p> <p>6 referring to that story; what are you referring</p> <p>7 to?</p> <p>8 A. Academically, socially that's a</p> <p>9 tougher environment. It's a dangerous</p> <p>10 environment. There's been violence in the</p> <p>11 classroom on more than one occasion.</p> <p>12 In a particular class that I was</p> <p>13 given in September of 2017 one child was</p> <p>14 brought to me who had previously only the week</p> <p>15 or so before been in a mental institution.</p> <p>16 I also had various social problems</p> <p>17 with the children where there was fighting,</p> <p>18 actual fist-fighting in the classroom.</p> <p>19 All this behavior got to the point</p> <p>20 where the class was actually classified as a</p> <p>21 12-1-1 class, which means the highest I could</p> <p>22 get was 12 of these students with one teacher</p> <p>23 and one aide at all times. However, sometimes</p> <p>24 it was up to five or six adults in the room</p> <p>25 because several students had one-to-one</p>

<p style="text-align: right;">Page 90</p> <p>1 - Ray Santana -</p> <p>2 teaching assistants because their behavior was</p> <p>3 a danger.</p> <p>4 And my assistant, who I worked</p> <p>5 with over the years, over 18 years at various</p> <p>6 times I was exposed to, had seen this and</p> <p>7 commented these were probably the worst</p> <p>8 students that we ever had.</p> <p>9 Q. You're saying that was the</p> <p>10 situation in September 2017?</p> <p>11 A. And it's been that way pretty</p> <p>12 consistent since I've been injured.</p> <p>13 Q. I want to ask you about what you</p> <p>14 said there in the Notice of Claim. You said</p> <p>15 that you're presently assigned to teaching in a</p> <p>16 dangerous environment?</p> <p>17 A. Yes.</p> <p>18 Q. What is your current assignment</p> <p>19 and why do you believe your current assignment</p> <p>20 is dangerous?</p> <p>21 A. My answer is twofold.</p> <p>22 Number One, I was a co-teacher</p> <p>23 with a Mr. Duffy from Mathematics, for several</p> <p>24 mathematical courses. Because of the injuries</p> <p>25 I suffered at the hands of my students I have</p>	<p style="text-align: right;">Page 91</p> <p>1 - Ray Santana -</p> <p>2 been in and out, but mostly out of the</p> <p>3 classroom and I have not been assigned any</p> <p>4 assistants.</p> <p>5 One telling example was by</p> <p>6 November 1, 2018 I was no longer able to work</p> <p>7 due to my injury. However, two days before,</p> <p>8 once again a fight started out in front of my</p> <p>9 classroom. Even though I keep my classroom</p> <p>10 locked at all times for security purposes, I</p> <p>11 had just opened the door to the classroom to</p> <p>12 allow the students to exit and a fight not only</p> <p>13 wound out working its way into my classroom but</p> <p>14 involved my entire classroom. It was not my</p> <p>15 students at that particular time, but students</p> <p>16 I'm not familiar who started throwing desks and</p> <p>17 chairs. And Security came and they nearly had</p> <p>18 to break it up.</p> <p>19 Q. The fight went from the hallway</p> <p>20 into your classroom?</p> <p>21 A. Correct; it was a dangerous</p> <p>22 situation.</p> <p>23 Once again, two days later, my</p> <p>24 students were starting to file out the door at</p> <p>25 the end of class, and all of a sudden they</p>
<p style="text-align: right;">Page 92</p> <p>1 - Ray Santana -</p> <p>2 stopped and I asked why. They said that</p> <p>3 Security had locked them in and would not allow</p> <p>4 them to leave.</p> <p>5 Q. Leave the classroom?</p> <p>6 A. Leave my classroom.</p> <p>7 In a previous fight one of the</p> <p>8 students fighting jumped out of the window to</p> <p>9 proceed to attack whoever they were attacking.</p> <p>10 But on the day that the students</p> <p>11 had stopped going and filing out the door there</p> <p>12 was another fight in front of the classroom and</p> <p>13 Security came and apologized that the reason</p> <p>14 why they had to shelter my students was in</p> <p>15 trying to avoid the fight migrating into my [</p> <p>16 classroom.</p> <p>17 Also, I have to be very, very</p> <p>18 careful with the student population. I've had</p> <p>19 incidents where gangs have worked their way in.</p> <p>20 I spoke to the Head of Security, whose name is</p> <p>21 Rosario, who said they were working on it.</p> <p>22 These are not only students of mine but they're</p> <p>23 coming from the outside.</p> <p>24 I've been threatened verbally. At</p> <p>25 one point when I called Security when Security</p>	<p style="text-align: right;">Page 93</p> <p>1 - Ray Santana -</p> <p>2 arrived the students started jumping out of the</p> <p>3 window to avoid Security. I was made to</p> <p>4 understand that subsequently several students</p> <p>5 were suspended.</p> <p>6 Q. What floor is your classroom on?</p> <p>7 A. It's on the first floor due to my</p> <p>8 injury. I have reasonable accommodations and</p> <p>9 there are no expectations to go up stairs.</p> <p>10 It's a very, very dangerous</p> <p>11 environment even for me to walk between</p> <p>12 classrooms. There are times when the students</p> <p>13 are there and there will be a fight or they're</p> <p>14 running and I've got to plaster myself against</p> <p>15 the wall.</p> <p>16 Q. Why do you believe your</p> <p>17 assignments have become more dangerous?</p> <p>18 A. Because of the nature of the</p> <p>19 students that I'm given on a regular basis.</p> <p>20 At one point I was given a</p> <p>21 restricted classroom. I stood in that</p> <p>22 classroom all day with the students because</p> <p>23 they were in a difficult environment. And the</p> <p>24 teachers for each subject area rotated and at</p> <p>25 all times I always had two assistants with me.</p>

<p style="text-align: right;">Page 94</p> <p>1 - Ray Santana -</p> <p>2 So, I mean --</p> <p>3 Q. I guess what I'm asking is, You</p> <p>4 didn't always have these sort of fighting</p> <p>5 issues with the students, you're basically</p> <p>6 saying these issues are since 2017; is that</p> <p>7 right?</p> <p>8 A. Probably since about 2015, 2014.</p> <p>9 Q. You've had these issues with</p> <p>10 students since 2014, 2015?</p> <p>11 A. Right.</p> <p>12 Q. Why do you believe you started</p> <p>13 getting assigned students who would get</p> <p>14 involved in fights and the other issues you</p> <p>15 just spoke about?</p> <p>16 A. There was probably a direct</p> <p>17 correlation to the fact that I was severely</p> <p>18 injured by a student on December 8, 2011</p> <p>19 breaking up a fight.</p> <p>20 Q. Why do you say that's directly</p> <p>21 related?</p> <p>22 A. Because of my injuries I've had to</p> <p>23 restrict my -- where I've been able to go and</p> <p>24 how much I'm involved with the school, even</p> <p>25 though I had an operation to try and correct</p>	<p style="text-align: right;">Page 95</p> <p>1 - Ray Santana -</p> <p>2 the damage. When it occurred at that time I</p> <p>3 had assignments going from one end of the</p> <p>4 school to the other, from one level to another.</p> <p>5 Even though I was -- at that time I was</p> <p>6 ambulatory, but only with the use of crutches.</p> <p>7 Q. Is it your testimony that due to</p> <p>8 having suffered an injury on the job in 2011</p> <p>9 that you've been assigned students with</p> <p>10 disciplinary issues as a result of having</p> <p>11 suffered an injury?</p> <p>12 A. Yes.</p> <p>13 I'm trying to -- The name escapes</p> <p>14 me at this very moment. Before I even got the</p> <p>15 students in September 2017 the Security Officer</p> <p>16 in charge of security for what is considered</p> <p>17 the ninth grade academy, which was segregated</p> <p>18 from the High School, specifically told me that</p> <p>19 the students that I would be getting were going</p> <p>20 to be exceedingly difficult and to try to write</p> <p>21 up as much as I could because he knew what was</p> <p>22 coming from Davis Junior High School.</p> <p>23 Q. Why do you believe you were</p> <p>24 assigned exceedingly difficult students?</p> <p>25 A. I believe because of my injuries.</p>
<p style="text-align: right;">Page 96</p> <p>1 - Ray Santana -</p> <p>2 And because it would have seemed to make common</p> <p>3 sense to not place me in a situation like that</p> <p>4 where I was barely ambulatory after the</p> <p>5 injuries I had suffered.</p> <p>6 Q. So regarding the injury you</p> <p>7 suffered in 2011, did you bring a claim with</p> <p>8 the New York State Workers' Compensation Board</p> <p>9 related to that injury?</p> <p>10 A. Yes, sir.</p> <p>11 Q. What was the outcome of that</p> <p>12 proceeding?</p> <p>13 A. That proceeding is on-going.</p> <p>14 Q. Have you received any benefits or</p> <p>15 payments from the New York State Workers'</p> <p>16 Compensation Board as a result of that claim?</p> <p>17 A. They paid for my first operation</p> <p>18 and paid for a little bit of my physical</p> <p>19 therapy after that.</p> <p>20 It became public knowledge from</p> <p>21 testimony -- sworn testimony that I was a</p> <p>22 disabled Vietnam era vet and from that day on</p> <p>23 it pretty much went south. They kept trying</p> <p>24 for a causal relationship even though I had</p> <p>25 been disabled over 36 years without any problem</p>	<p style="text-align: right;">Page 97</p> <p>1 - Ray Santana -</p> <p>2 with employment, even though the school was not</p> <p>3 aware that I was a disabled Vietnam vet.</p> <p>4 I also submitted on several</p> <p>5 occasions, as is the standard practice, to</p> <p>6 physicals by private physicians at the request</p> <p>7 of the District, which they do periodically.</p> <p>8 I had teachers to testify on my</p> <p>9 ability to perform my duties and my injuries as</p> <p>10 a veteran would never be discussed because they</p> <p>11 did not affect me.</p> <p>12 Once there was testimony at</p> <p>13 Workers' Compensation it became apparent that I</p> <p>14 was a disabled Vietnam era vet and the District</p> <p>15 tried to use that argument for not having to</p> <p>16 pay for any further treatment. That was</p> <p>17 negated by the Hearing Officer who explained</p> <p>18 that was not a defense they could use; all that</p> <p>19 needed to be determined was whether I had been</p> <p>20 kicked -- were his exact words -- and did I</p> <p>21 suffer an injury.</p> <p>22 Q. Let me ask you --</p> <p>23 A. I'm going to go further.</p> <p>24 Q. Okay; go ahead.</p> <p>25 A. When it became apparent not only</p>

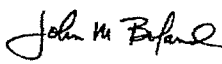
<p style="text-align: right;">Page 98</p> <p>1 - Ray Santana -</p> <p>2 through my physicians but also the physician</p> <p>3 for the District required me to go to have my</p> <p>4 knee replaced the District insurance --</p> <p>5 Workers' Compensation insurance monitors said</p> <p>6 that my BMI, Body Mass Index, was too high and</p> <p>7 that I needed to bring it down, which I was</p> <p>8 able to do to the specifications that they</p> <p>9 wanted within about two-and-a-half months, at</p> <p>10 which point they should have provided for the</p> <p>11 operation. When the evidence was given that I</p> <p>12 had fulfilled their requirements they</p> <p>13 specifically said no, they weren't going to</p> <p>14 approve the operation, at which time I spoke</p> <p>15 with my attorney who put in a appeal which they</p> <p>16 subsequently lost.</p> <p>17 However, I was getting to the</p> <p>18 point where I could barely function. And when</p> <p>19 I went to Veterans Administration they took</p> <p>20 over. They're the ones who provided me with a</p> <p>21 new knee and have been treating me ever since.</p> <p>22 So yes, I have been discriminated</p> <p>23 against. It's a matter of public record</p> <p>24 specifically because of the injuries that I</p> <p>25 suffered while I was in the service of my</p>	<p style="text-align: right;">Page 99</p> <p>1 - Ray Santana -</p> <p>2 country and also because of the injuries I</p> <p>3 suffered while performing my duties as a</p> <p>4 teacher, which is not only to educate the</p> <p>5 children but to provide them with a safe</p> <p>6 environment.</p> <p>7 Q. Okay, just to make sure I</p> <p>8 understand your testimony.</p> <p>9 You believe that -- essentially</p> <p>10 that your current assignments over the last</p> <p>11 several years, the fact that you've been</p> <p>12 assigned students who have had disciplinary</p> <p>13 issues, is related to the Workers' Compensation</p> <p>14 proceeding you brought due to the injury you</p> <p>15 suffered in 2011; is that correct?</p> <p>16 A. Correct.</p> <p>17 Q. So at the beginning of the Notice</p> <p>18 of Claim I noticed it says that the Mount</p> <p>19 Vernon City School District acted in a</p> <p>20 retaliatory fashion. Can you tell me what the</p> <p>21 basis of that allegation is; essentially</p> <p>22 retaliation for what?</p> <p>23 MR. GLASS: Didn't he just do</p> <p>24 that? Do you want a summary?</p> <p>25 Q. I'm asking, are there -- Let me</p>
<p style="text-align: right;">Page 100</p> <p>1 - Ray Santana -</p> <p>2 ask this.</p> <p>3 What you just referred to</p> <p>4 concerning the Workers' Compensation claim, is</p> <p>5 that the basis for your claim that the District</p> <p>6 acted in a retaliatory fashion?</p> <p>7 A. The question previous to which at</p> <p>8 length I gave you examples was dealing with a</p> <p>9 dangerous environment.</p> <p>10 Q. That's right.</p> <p>11 A. The retaliatory would be the</p> <p>12 following: Because of my age, as I described,</p> <p>13 the assignment to Room 325 by the Principal not</p> <p>14 only just --</p> <p>15 MR. GLASS: You mean 225?</p> <p>16 THE WITNESS: 225.</p> <p>17 A. -- it was fairly obvious that was</p> <p>18 a retaliatory room; it was being used for</p> <p>19 purposes of retaliation. Because subsequently</p> <p>20 the room was reassigned to someone who was even</p> <p>21 more senior than myself.</p> <p>22 MR. GLASS: Note my objection.</p> <p>23 I'm not sure my client fully</p> <p>24 understands what "retaliation" means in this</p> <p>25 context. I think he did give you one form of</p>	<p style="text-align: right;">Page 101</p> <p>1 - Ray Santana -</p> <p>2 retaliation. I don't think -- The legal term I</p> <p>3 don't know if he fully understands what that</p> <p>4 means in this context.</p> <p>5 You can ask if he had any age</p> <p>6 based complaint prior to that; you can ask</p> <p>7 that. Right now it's a legal term and I don't</p> <p>8 think he understands what "retaliation" means</p> <p>9 in this context.</p> <p>10 Q. Who assigned you to Room 225?</p> <p>11 A. That was the room I was assigned</p> <p>12 at the beginning of the year; that's where I</p> <p>13 would be teaching my course of studies.</p> <p>14 Q. Right.</p> <p>15 A. I spoke with Superintendent</p> <p>16 Kenneth Hamilton who spoke with the Principal</p> <p>17 apparently over the phone. This person told me</p> <p>18 that I was in the wrong place even though I was</p> <p>19 able to give him the necessary paperwork to</p> <p>20 indicate that I was to be there each day. I've</p> <p>21 got paperwork of not only the roster but where</p> <p>22 I was supposed to be kept, indicating what was</p> <p>23 supposed to be a classroom.</p> <p>24 When I did change to Room 236</p> <p>25 that's when the Principal reissued the</p>



<p style="text-align: right;">Page 102</p> <p>1 - Ray Santana -</p> <p>2 classroom to another teacher in the same</p> <p>3 condition, in the same manner. So it became</p> <p>4 pretty blatant in and of itself.</p> <p>5 Q. Had this particular Principal made</p> <p>6 any age related comments to you?</p> <p>7 A. No.</p> <p>8 Q. Do you believe that anyone from</p> <p>9 the District has ever retaliated against you</p> <p>10 for something you've said or done during your</p> <p>11 employment with the District?</p> <p>12 MR. GLASS: I'm going to object.</p> <p>13 A. Yes.</p> <p>14 MR. GOLDSTEIN: It's not a legal</p> <p>15 term; it's common vernacular, the term</p> <p>16 "retaliate."</p> <p>17 MR. GLASS: It's a legal term.</p> <p>18 It's irrelevant in the sense that you heard</p> <p>19 about Workers' Comp and the claim he filed and</p> <p>20 how he suffered because of it. It's not fair</p> <p>21 to him to ask him in this context.</p> <p>22 "Discriminate" and "retaliate" are legal terms</p> <p>23 as well as having a meaning in a general sense.</p> <p>24 I think those questions can be misleading.</p> <p>25 MR. GOLDSTEIN: That's fine.</p>	<p style="text-align: right;">Page 103</p> <p>1 - Ray Santana -</p> <p>2 Let me look over my notes.</p> <p>3 Q. I believe you testified a little</p> <p>4 while ago that you were discriminated against</p> <p>5 based on national origin. What's the basis for</p> <p>6 your allegation that you've been discriminated</p> <p>7 against on the basis of national origin?</p> <p>8 A. For the past two years a</p> <p>9 non-tenured retired teacher of European</p> <p>10 background has been assigned as a Substitute</p> <p>11 Librarian. This is a teacher who worked</p> <p>12 intimately with the Principal in the office and</p> <p>13 ran some sort of programs and everything. She</p> <p>14 decided to retire, and she's been in this</p> <p>15 position -- State mandated position that</p> <p>16 requires based upon the school population two</p> <p>17 certified Librarians. That's my basis for that</p> <p>18 occurring.</p> <p>19 Q. What is this person's name?</p> <p>20 A. Ms. Nancy D'Amico.</p> <p>21 Q. She's a substitute teacher?</p> <p>22 A. She's a substitute teacher,</p> <p>23 retired, and worked with the Principal.</p> <p>24 Q. Has any District Administrator</p> <p>25 made any race or national origin based comments</p>
<p style="text-align: right;">Page 104</p> <p>1 - Ray Santana -</p> <p>2 to you?</p> <p>3 A. Not that I can recall.</p> <p>4 Q. Has any District employee ever</p> <p>5 made any race or national origin based comments</p> <p>6 to you?</p> <p>7 A. Not that I can recall.</p> <p>8 THE WITNESS: May I have a break,</p> <p>9 please?</p> <p>10 MR. GOLDSTEIN: Yes.</p> <p>11 THE WITNESS: Also, may I confer</p> <p>12 with Counsel?</p> <p>13 MR. GOLDSTEIN: Absolutely.</p> <p>14 (Whereupon a break was taken from</p> <p>15 12:45 a.m. to 12:55 p.m.)</p> <p>16 Q. I want to just ask you something</p> <p>17 briefly; I realized I forgot to ask you this</p> <p>18 before.</p> <p>19 If you would, look at Exhibit C,</p> <p>20 which is the copy of the transcript if I'm not</p> <p>21 mistaken.</p> <p>22 A. (Witness examines document.)</p> <p>23 Yes; yes.</p> <p>24 Q. I want to ask you something I</p> <p>25 forgot to ask you before.</p>	<p style="text-align: right;">Page 105</p> <p>1 - Ray Santana -</p> <p>2 Did you discuss what should be in</p> <p>3 the transcript with anyone before composing</p> <p>4 this transcript?</p> <p>5 A. I don't understand the question;</p> <p>6 I'm sorry.</p> <p>7 Q. Before creating this transcript</p> <p>8 did you have any conversation with anyone about</p> <p>9 what should be in the transcript?</p> <p>10 A. I only provided what I was told as</p> <p>11 best as I could hear it.</p> <p>12 Q. Was any part of the conversation</p> <p>13 that you had with Matt F omitted from this</p> <p>14 transcript?</p> <p>15 A. To the best of my knowledge, no.</p> <p>16 If so I tried to indicate as such by writing</p> <p>17 "unintelligible."</p> <p>18 Q. Did you share this transcript with</p> <p>19 anyone?</p> <p>20 A. Yes.</p> <p>21 Q. Who did you provide a copy of this</p> <p>22 transcript to.</p> <p>23 A. The New York State Human Rights</p> <p>24 Division.</p> <p>25 Q. Is there anyone else?</p>

<p style="text-align: right;">Page 106</p> <p>1 - Ray Santana -</p> <p>2 A. My attorney just now.</p> <p>3 Q. Are you claiming emotional</p> <p>4 damages; are you planning on claiming emotional</p> <p>5 damages?</p> <p>6 THE WITNESS: May I speak with my</p> <p>7 attorney just a moment?</p> <p>8 MR. GOLDSTEIN: Sure.</p> <p>9 (Whereupon an off-the-record</p> <p>10 discussion was held between the Witness and his</p> <p>11 attorney.)</p> <p>12 (The question referred to was read</p> <p>13 back by the Court Reporter.)</p> <p>14 A. Yes, sir.</p> <p>15 Q. What is the basis for the</p> <p>16 emotional damages?</p> <p>17 A. I'm currently seeing a Veterans</p> <p>18 Administration counselor on a weekly basis.</p> <p>19 Q. Do you pay for that counselor</p> <p>20 out-of-pocket?</p> <p>21 A. It's the Veterans Administration.</p> <p>22 How it's being paid for I haven't the faintest</p> <p>23 idea.</p> <p>24 Q. Is that insurance covered under</p> <p>25 the Veterans Administration?</p>	<p style="text-align: right;">Page 107</p> <p>1 - Ray Santana -</p> <p>2 A. I don't understand the question.</p> <p>3 Q. Do you receive healthcare benefits</p> <p>4 from the District?</p> <p>5 A. Yes, I do.</p> <p>6 Q. Do you receive healthcare benefits</p> <p>7 from the Veterans Administration?</p> <p>8 A. Yes, I do.</p> <p>9 Q. Are there any expenses that you've</p> <p>10 incurred as a result of seeing a counselor at</p> <p>11 the VA?</p> <p>12 A. Not that I can think of.</p> <p>13 Q. Besides seeing a counselor at the</p> <p>14 VA is there any other basis for you claiming</p> <p>15 emotional damages?</p> <p>16 A. I'm not at liberty to discuss that</p> <p>17 right now. That would have to be something</p> <p>18 that would have to be discussed my eye</p> <p>19 counselor and I'm not quite sure how the HIPAA</p> <p>20 Law would work with that, so I have to decline</p> <p>21 comment.</p> <p>22 Q. All right.</p> <p>23 Besides the recorded conversation</p> <p>24 with the NYSED official have you recorded any</p> <p>25 conversation with any District personnel?</p>
<p style="text-align: right;">Page 108</p> <p>1 - Ray Santana -</p> <p>2 A. No, sir.</p> <p>3 Q. Do you keep a diary or journal?</p> <p>4 A. No, sir.</p> <p>5 Q. Do you have any social media</p> <p>6 accounts?</p> <p>7 A. No, sir.</p> <p>8 Q. Besides emotional damages are you</p> <p>9 seeking to claim any other form of damages?</p> <p>10 A. I would have to leave that up to</p> <p>11 the discretion of my Counsel.</p> <p>12 Q. In the twelfth paragraph of your</p> <p>13 Notice of Claim you refer to "the claim</p> <p>14 involves a continuing wrong."</p> <p>15 A. Hold on.</p> <p>16 Q. The Notice of Claim is</p> <p>17 Respondent's A; if you go to the third page.</p> <p>18 (Witness examines document.)</p> <p>19 A. Thank you.</p> <p>20 Q. Where it says, quote, since the</p> <p>21 claim involves a continuing wrong, what do you</p> <p>22 allege is the "continuing wrong"?</p> <p>23 A. I'd have to refer to my Counsel</p> <p>24 for that.</p> <p>25 Q. What do you believe; do you</p>	<p style="text-align: right;">Page 109</p> <p>1 - Ray Santana -</p> <p>2 believe any action of discrimination against</p> <p>3 you has all occurred in the past or do you</p> <p>4 believe you're presently being discriminated</p> <p>5 against?</p> <p>6 A. It's the basis of what we</p> <p>7 discussed; there's probably some other things.</p> <p>8 Q. Like what?</p> <p>9 A. I'm not able to articulate that at</p> <p>10 this very moment.</p> <p>11 MR. GOLDSTEIN: Okay, I'm done.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25 (Continued on next page.)</p>



<p style="text-align: right;">Page 110</p> <p>1 - Ray Santana -</p> <p>2 (Whereupon the matter was</p> <p>3 concluded.)</p> <p>4 (Time noted: 1:04 p.m.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8 Ray Santana</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15 * * *</p> <p>16 Subscribed and sworn to</p> <p>17 before me this day</p> <p>18 of , 2019.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 111</p> <p>1</p> <p>2 STATE OF NEW YORK</p> <p>3 COUNTY OF ROCKLAND</p> <p>4</p> <p>5 I, John M. Boland, a Shorthand</p> <p>6 Reporter and Notary Public within and for the</p> <p>7 State of New York, do hereby certify:</p> <p>8 That RAY SANTANA, Witness, whose</p> <p>9 examination is hereinbefore set forth, was duly</p> <p>10 sworn/affirmed by me, and that the transcript</p> <p>11 of said examination is a true record of the</p> <p>12 testimony given by the Witness.</p> <p>13 I further certify that I am not</p> <p>14 related to any of the parties to this action by</p> <p>15 blood or marriage and that I am in no way</p> <p>16 interested in the outcome of this matter.</p> <p>17 IN WITNESS WHEREOF, I have hereunto</p> <p>18 set my hand this 12th day of July, 2019.</p> <p>19</p> <p>20 </p> <p>21</p> <p>22 John M. Boland</p> <p>23</p> <p>24</p> <p>25</p>												
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